

From: Lassiter, Penny
Location: RTP-D201-Max40/RTP-Bldg-D
Importance: Normal
Subject: Chloroprene Call with Denka/Dupont
Start Date/Time: Wed 12/9/2015 7:30:00 PM
End Date/Time: Wed 12/9/2015 8:30:00 PM

Ex. 6 - Personal Privacy

Ex. 5 - Deliberative

On the call from Denka:

Jorge Lavastida, Plant Manager Denka La Place
Patrick Walsh, Denka La Place
Tabuchi Koki, Denka Japan - President & CEO Denka Elastomers, LLC
Kawamura Nao, Denka Japan
Tricia Ferguson, Denka
Debbie Mulrooney, DuPont

To: Bremer, Kristen[Bremer.Kristen@epa.gov]; Drinkard, Andrea[Drinkard.Andrea@epa.gov]
From: Millett, John
Sent: Thur 12/17/2015 9:51:01 PM
Subject: RE: chloroprene talking points

Right – mainly for David’s use with the community/s, as opposed to us posting it online . . .

From: Bremer, Kristen
Sent: Thursday, December 17, 2015 4:50 PM
To: Millett, John <Millett.John@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: RE: chloroprene talking points

And what they’re producing will be a public piece, so the messaging is a little less technical. If we get any press that needs their input, they’re willing to assist.

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: bremer.kristen@epa.gov

Phone: 919.541.9424

Ex. 6 - Personal Privacy

From: Millett, John
Sent: Thursday, December 17, 2015 4:47 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: RE: chloroprene talking points

Understood. Thanks – no one’s beating the door down, but just making sure the status is the

same . . .

From: Bremer, Kristen
Sent: Thursday, December 17, 2015 4:46 PM
To: Millett, John <Millett.John@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: RE: chloroprene talking points

We heard from ATSDR last night. The materials were sent to CDC in Atlanta yesterday for review. They are fast tracking it, but no definitive ETA. It will likely be tomorrow at the earliest.

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: bremer.kristen@epa.gov

Phone: 919.541.9424

Ex. 6 - Personal Privacy

From: Millett, John
Sent: Thursday, December 17, 2015 4:43 PM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: FW: chloroprene talking points

Fyi – any word from ATSDR?

From: Deener, Kathleen
Sent: Thursday, December 17, 2015 4:42 PM

To: Distefano, Nichole <DiStefano.Nichole@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>
Cc: Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Piantanida, David <Piantanida.David@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>; Millett, John <Millett.John@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Gwinn, Maureen <gwinn.maureen@epa.gov>; Vandenberg, John <Vandenberg.John@epa.gov>
Subject: chloroprene talking points

Hi Nichole and Melissa –

Attached are some talking points about the chloroprene IRIS assessment. Please let me know if you have questions or need additional information. Many thanks to Lou D'Amico in NCEA for putting these together.

Thanks,

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | **Ex. 6 - Personal Privacy**

deener.kathleen@epa.gov

To: Bremer, Kristen[Bremer.Kristen@epa.gov]
Cc: Drinkard, Andrea[Drinkard.Andrea@epa.gov]
From: Millett, John
Sent: Thur 12/17/2015 5:17:59 PM
Subject: RE: Updated NATA materials

Thanks – stuff has been with Debbie and Janet since 10:30 or so, q/a followed just after . . .

Updated key messages and our internal chloroprene comms plan also on the Z . . .

From: Bremer, Kristen
Sent: Thursday, December 17, 2015 11:10 AM
To: Millett, John <Millett.John@epa.gov>
Cc: Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: Updated NATA materials

Hi John-

I placed the clean fact sheet and the internal Qs&As on the Z drive, but I've also attached them here.

We also have another Q to add to the chloroprene materials:

Q. Are there documented cases of cancer in La Place that are caused by the facility?

Ex. 5 - Deliberative

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: bremer.kristen@epa.gov

Phone: 919.541.9424

Ex. 6 - Personal Privacy

To: Bremer, Kristen[Bremer.Kristen@epa.gov]
Cc: Drinkard, Andrea[Drinkard.Andrea@epa.gov]
From: Millett, John
Sent: Thur 12/17/2015 4:11:00 PM
Subject: RE: Updated NATA materials

Thanks!

From: Bremer, Kristen
Sent: Thursday, December 17, 2015 11:10 AM
To: Millett, John <Millett.John@epa.gov>
Cc: Drinkard, Andrea <Drinkard.Andrea@epa.gov>
Subject: Updated NATA materials

Hi John-

I placed the clean fact sheet and the internal Qs&As on the Z drive, but I've also attached them here.

We also have another Q to add to the chloroprene materials:

Q. Are there documented cases of cancer in La Place that are caused by the facility?

Ex. 5 - Deliberative

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: bremer.kristen@epa.gov

Phone: 919.541.9424

Ex. 6 - Personal Privacy

To: Bremer, Kristen[Bremer.Kristen@epa.gov]; Drinkard, Andrea[Drinkard.Andrea@epa.gov]
From: Millett, John
Sent: Thur 12/17/2015 3:03:56 PM
Subject: Fwd: Chloroprene

FYI.

John Millett
202.510.1822

Begin forwarded message:

From: "Deener, Kathleen" <Deener.Kathleen@epa.gov>
Date: December 17, 2015 at 7:30:37 AM EST
To: "Millett, John" <Millett.John@epa.gov>
Cc: "Harrison, Melissa" <Harrison.Melissa@epa.gov>, "Distefano, Nichole" <DiStefano.Nichole@epa.gov>, "Hubbard, Carolyn" <Hubbard.Carolyn@epa.gov>, "Purchia, Liz" <Purchia.Liz@epa.gov>
Subject: Re: Chloroprene

Thanks. This is helpful. I'll continue working with NCEA on talking points about the science of the IRIS assessment.

Sent from my iPhone

On Dec 17, 2015, at 7:29 AM, Millett, John <Millett.John@epa.gov> wrote:

That's correct, Melissa. I don't think we need a formal fact sheet from ORD, but we could ask them to review what astdr and OAQPS works up and add any key points.

Also, we should be seeing something from astdr today. They sped up!

John Millett
202.510.1822

On Dec 17, 2015, at 7:10 AM, Harrison, Melissa <Harrison.Melissa@epa.gov> wrote:

+Millett and Liz

I thought a fact sheet or chloroprene was already being developed for the community meetings and would be done by Friday. If not, then yes we also need a fact sheet.

Melissa J. Harrison

Press Secretary

U.S. Environmental Protection Agency

Office: (202) 564-8421

Mobile: **Ex. 6 - Personal Privacy**

Harrison.Melissa@epa.gov

On Dec 16, 2015, at 11:06 PM, Distefano, Nichole
<DiStefano.Nichole@epa.gov> wrote:

I think both. Right Liz?

Sent from my iPhone

On Dec 16, 2015, at 6:44 PM, Deener, Kathleen
<Deener.Kathleen@epa.gov> wrote:

Nichole – just to clarify, do you want both a factsheet and talking points, or just talking points?

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | (mobile) **Ex. 6 - Personal Privacy**

deener.kathleen@epa.gov

From: Distefano, Nichole
Sent: Wednesday, December 16, 2015 6:43 PM

To: Deener, Kathleen <Deener.Kathleen@epa.gov>
Cc: Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>; Vandenberg, John <Vandenberg.John@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Millett, John <Millett.John@epa.gov>; Purchia, Liz <Purchia.Liz@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Gray, David <gray.david@epa.gov>
Subject: Re: Chloroprene

Thanks Kacee. I am looping folks in OPA and David Gray from R6

Sent from my iPhone

On Dec 16, 2015, at 6:39 PM, Deener, Kathleen <Deener.Kathleen@epa.gov> wrote:

Hi Nichole –

Per our conversation this evening, here are a few relevant publicly available pieces of information about chloroprene:

1. The publicly available IRIS Summary:
http://cfpub.epa.gov/ncea/iris/iris_documents/documents/subst/1021_summary.pdf
2. The evaluation by the International Agency for Research on Cancer (IARC):
<http://monographs.iarc.fr/ENG/Monographs/vol71/mono71-9.pdf>
3. The evaluation by the National Toxicology Program's Report on Carcinogens:
<https://ntp.niehs.nih.gov/ntp/roc/content/profiles/chloroprene.pdf>

The IRIS assessment (from 2010) classifies chloroprene as “likely to be carcinogenic to humans.” This is based on human epidemiological data, animal toxicology data, and a mutagenic mode of action (which means there’s evidence that chloroprene causes mutations).

The IARC evaluation (from 1999) classifies chloroprene as “possibly carcinogenic to humans.” IARC is the specialized cancer agency of the World Health Organization.

The National Toxicology Program’s (NTP) Report on Carcinogens (from 2005) classifies chloroprene as “reasonably anticipated to be a human carcinogen.” This is based on evidence of tumors at multiple tissue sites in multiple species of animals. The Report on Carcinogens is a congressionally mandated, science-based, public health document that NTP prepares. The report identifies agents, substances, mixtures, and exposure circumstances that are known or reasonably anticipated to cause cancer in humans.

I’m working with NCEA to get a factsheet put together as well as some talking points about the science. Carolyn Hubbard, ORD’s Communications Director, is looped in (and she has connected with OAR’s Communications Director) as in NCEA’s Communications Director, Lou D’Amico.

Hope this helps for now.

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | (mobile) **Ex. 6 - Personal Privacy**

deener.kathleen@epa.gov

To: Deener, Kathleen[Deener.Kathleen@epa.gov]
Cc: Millett, John[Millett.John@epa.gov]; Vandenberg, John[Vandenberg.John@epa.gov]; Brown, Ann[Brown.Ann@epa.gov]; Harrison, Melissa[Harrison.Melissa@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]; D'Amico, Louis[DAmico.Louis@epa.gov]
From: Hubbard, Carolyn
Sent: Wed 12/16/2015 11:33:48 PM
Subject: Re: Chloroprene talking points

Great- Thank you!

Carolyn Hubbard
Science Communications
US EPA Office of Research and Development (ORD)
Hubbard.carolyn@epa.gov
202-564-2189
202-379-6744

On Dec 16, 2015, at 6:32 PM, Deener, Kathleen <Deener.Kathleen@epa.gov> wrote:

Thanks Carolyn. I just got a call from Nichole in OCIR about this. I'm getting ready to send Nichole some publicly available information about chloroprene (I'll share with this group), and I've spoken with Lou about a fact sheet (which Nichole also asked for) and talking points.

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | (mobile) **Ex. 6 - Personal Privacy**

deener.kathleen@epa.gov

From: Hubbard, Carolyn
Sent: Wednesday, December 16, 2015 6:31 PM
To: Millett, John <Millett.John@epa.gov>
Cc: Vandenberg, John <Vandenberg.John@epa.gov>; Brown, Ann <Brown.Ann@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Deener, Kathleen <Deener.Kathleen@epa.gov>
Subject: Re: Chloroprene talking points

Hi- I'm adding Lou and Kacee. Thanks John.

Carolyn Hubbard

Science Communications

US EPA Office of Research and Development (ORD)

Hubbard.carolyn@epa.gov

202-564-2189

Ex. 6 - Personal Privacy

On Dec 16, 2015, at 6:22 PM, Millett, John <Millett.John@epa.gov> wrote:

Hi Carolyn, Ann and John – Melissa and Liz in OPA are asking for chloroprene talking points. My sense is that they would cover the IRIS assessment, health effects, and other assessments of its toxicity. The request is for ORD to provide tomorrow by noon, if at all possible.

Thanks -- John

~~~~~

John Millett

Director, OAR Communications

Desk: 202-564-2903

**Ex. 6 - Personal Privacy**

**To:** Bremer, Kristen[Bremer.Kristen@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]; Sasser, Erika[Sasser.Erika@epa.gov]  
**Cc:** Keating, Martha[keating.martha@epa.gov]  
**From:** Terry, Sara  
**Sent:** Wed 12/16/2015 3:43:42 PM  
**Subject:** FW: Request for call from LA members on NATA

I'm going to set up something for 3:30 as pre-brief.

**From:** Bailey, KevinJ  
**Sent:** Wednesday, December 16, 2015 10:41 AM  
**To:** Terry, Sara <Terry.Sara@epa.gov>; Niebling, William <Niebling.William@epa.gov>; Haman, Patricia <Haman.Patricia@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>  
**Cc:** Asher, Jonathan <Asher.Jonathan@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>  
**Subject:** RE: Request for call from LA members on NATA

Pat is calling Rep. Graves' staff as we speak to confirm whether this call will be at the member or staff level. In the meantime, can we get a pre-brief together to include materials on the LA plant.

Ex. 5 - Deliberative

## Ex. 5 - Deliberative

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**From:** Terry, Sara  
**Sent:** Wednesday, December 16, 2015 8:38 AM  
**To:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>; Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>  
**Cc:** Asher, Jonathan <[Asher.Jonathan@epa.gov](mailto:Asher.Jonathan@epa.gov)>; Cyran, Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>; Lubetsky, Jonathan <[Lubetsky.Jonathan@epa.gov](mailto:Lubetsky.Jonathan@epa.gov)>  
**Subject:** RE: Request for call from LA members on NATA

I've put this on Erika and Kelly's calendars, and we'll try to get the right couple of staff as needed from our end.

Sara

**From:** Niebling, William  
**Sent:** Tuesday, December 15, 2015 6:23 PM  
**To:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>; Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>  
**Cc:** Asher, Jonathan <[Asher.Jonathan@epa.gov](mailto:Asher.Jonathan@epa.gov)>; Cyran, Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>; Lubetsky, Jonathan <[Lubetsky.Jonathan@epa.gov](mailto:Lubetsky.Jonathan@epa.gov)>  
**Subject:** RE: Request for call from LA members on NATA

++

I've just spoken w/ Jonathan Asher about this.

**From:** Niebling, William  
**Sent:** Tuesday, December 15, 2015 6:00 PM  
**To:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>; Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>  
**Subject:** RE: Request for call from LA members on NATA



Okay, thanks. I have caused a hold to be put on Janet's calendar for 430pm – 5pm tomorrow, and I will let OAQPS know this might be coming. If it includes Members, Janet will likely want to do it (and is available to). If not, we'll find senior staff to brief Hill staff.

**From:** Haman, Patricia

**Sent:** Tuesday, December 15, 2015 5:44 PM

**To:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>

**Subject:** RE: Request for call from LA members on NATA

They have indicated the members themselves but we will confirm that when we speak to them.  
Pat

Patricia Haman

Office of Congressional Affairs

U.S. EPA

202-564-2806

**From:** Niebling, William

**Sent:** Tuesday, December 15, 2015 5:31 PM

**To:** Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>

**Cc:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>

**Subject:** RE: Request for call from LA members on NATA

Would this be staff or the members themselves?

**From:** Bailey, KevinJ

**Sent:** Tuesday, December 15, 2015 5:26 PM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>; Niebling,

William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>

**Cc:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>

**Subject:** Request for call from LA members on NATA

We received a request from Rep. Graves' office asking for a phone call at 4:30pm tomorrow on chloroprene and the NATA modeling. The call would include Reps. Graves, Richmond, Boustany, and Senator Cassidy (Pat got a separate call from Sen. Cassidy's office asking for a call as well). They've been alerted to the announcement happening later this week, I'm assuming from the state folks.

We're working with Nichole to figure out how to best handle, but may need to do the call tomorrow and wanted to put folks on notice in case that's the direction we get. More to come from either Pat or me...

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**To:** Terry, Sara[Terry.Sara@epa.gov]  
**Cc:** Koerber, Mike[Koerber.Mike@epa.gov]; South, Peter[South.Peter@epa.gov]; Keating, Martha[keating.martha@epa.gov]; Wayland, Richard[Wayland.Richard@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]  
**From:** Noonan, Jenny  
**Sent:** Wed 12/16/2015 3:01:02 PM  
**Subject:** FW: Request for call from LA members on NATA

Sara –

Would you sort this out and get in touch with DC via Pete or Mike?

Thanks,

Jenny

**From:** Atkinson, Emily  
**Sent:** Wednesday, December 16, 2015 9:20 AM  
**To:** Sasser, Erika <Sasser.Erika@epa.gov>; Niebling, William <Niebling.William@epa.gov>  
**Cc:** McCabe, Janet <McCabe.Janet@epa.gov>; Jordan, Deborah <Jordan.Deborah@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Stewart, Lori <Stewart.Lori@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Millett, John <Millett.John@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Page, Steve <Page.Steve@epa.gov>; Gray, David <gray.david@epa.gov>  
**Subject:** RE: Request for call from LA members on NATA  
**Importance:** High

We are holding today at 4:30pm ET for a 30 minute call. Please let me know if this is confirmed on your end and who I should include on the meeting notice.

Thank you.

Emily

Emily Atkinson  
Staff Assistant

Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

**From:** Sasser, Erika

**Sent:** Tuesday, December 15, 2015 7:10 PM

**To:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>

**Cc:** McCabe, Janet <[McCabe.Janet@epa.gov](mailto:McCabe.Janet@epa.gov)>; Jordan, Deborah <[Jordan.Deborah@epa.gov](mailto:Jordan.Deborah@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Stewart, Lori <[Stewart.Lori@epa.gov](mailto:Stewart.Lori@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>; Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Millett, John <[Millett.John@epa.gov](mailto:Millett.John@epa.gov)>; Lubetsky, Jonathan <[Lubetsky.Jonathan@epa.gov](mailto:Lubetsky.Jonathan@epa.gov)>; Cyran, Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>; Noonan, Jenny <[Noonan.Jenny@epa.gov](mailto:Noonan.Jenny@epa.gov)>; Rimer, Kelly <[Rimer.Kelly@epa.gov](mailto:Rimer.Kelly@epa.gov)>; Bremer, Kristen <[Bremer.Kristen@epa.gov](mailto:Bremer.Kristen@epa.gov)>; Page, Steve <[Page.Steve@epa.gov](mailto:Page.Steve@epa.gov)>; Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)>

**Subject:** Re: Request for call from LA members on NATA

Yes, we will get that ready. We will coordinate with R6--David Gray has been doing a great job leading the stakeholder calls in the region and may have a set of talking points we can work from.

From Erika's iPhone

On Dec 15, 2015, at 6:25 PM, Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)> wrote:

Hi all – There is a request from four members of the Louisiana congressional delegation for a Member-level call at 430pm tomorrow on LaPlace / NATA. I have held 430pm on Janet's calendar for the call, but we will obviously want some OAQPS support. I expect R6 will join as well. There's a chance this will get turned into a Region-OAQPS call but the working plan is a Janet-OAQPS-Region call.

I don't know the exact prompt but I think it will be to brief them and answer questions, not

their coming with a particular agenda. I'm not sure the state of our TPs and Q&As but whoever is leading it (Janet or Ron) will need a script. Maybe I can ask OAQPS to prepare that if you don't already have something ready?

Thanks.

-Wm.

**From:** Bailey, KevinJ

**Sent:** Tuesday, December 15, 2015 5:26 PM

**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>; Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>

**Cc:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>

**Subject:** Request for call from LA members on NATA

We received a request from Rep. Graves' office asking for a phone call at 4:30pm tomorrow on chloroprene and the NATA modeling. The call would include Reps. Graves, Richmond, Boustany, and Senator Cassidy (Pat got a separate call from Sen. Cassidy's office asking for a call as well). They've been altered to the announcement happening later this week, I'm assuming from the state folks.

We're working with Nichole to figure out how to best handle, but may need to do the call tomorrow and wanted to put folks on notice in case that's the direction we get. More to come from either Pat or me...

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**To:** Smith, Darcie[Smith.Darcie@epa.gov]; Strum, Madeleine[Strum.Madeleine@epa.gov]; Palma, Ted[Palma.Ted@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]; Merrill, Raymond[Merrill.Raymond@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]  
**Cc:** Wayland, Richard[Wayland.Richard@epa.gov]; Weinstock, Lewis[Weinstock.Lewis@epa.gov]  
**From:** Shelow, David  
**Sent:** Tue 12/15/2015 8:49:46 PM  
**Subject:** FW: West Louisville report  
[WLATS\\_RiskAssessmentReport.pdf](#)

Here is the report from Region 4 for Louisville Kentucky chloroprene study at DuPont in KY.

David M. Shelow  
National Air Toxics Ambient Monitoring Program Manager  
U.S. Environmental Protection Agency  
Office of Air Quality Planning and Standards  
Ambient Air Monitoring Group C304-06  
Research Triangle Park, NC 27711  
Phone: 919-541-3776  
Fax: 919-541-1903  
Email: [shelow.david@epa.gov](mailto:shelow.david@epa.gov)

**From:** France, Danny  
**Sent:** Tuesday, December 15, 2015 3:46 PM  
**To:** Noah, Greg <Noah.Greg@epa.gov>; Shelow, David <Shelow.David@epa.gov>  
**Subject:** West Louisville report

Got your message. Hope this helps.

Danny

Danny France

Chief, Analytical Services Branch

Region 4, EPA, Science and Ecosystems Support Division

980 College Station Rd

Athens, GA 30605

(706) 355-8738 (office)



**To:** Bremer, Kristen[Bremer.Kristen@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]  
**From:** Cortelyou-Lee, Jan  
**Sent:** Tue 12/15/2015 8:20:44 PM  
**Subject:** Risk Summary for LA  
[risk2 \(00000003\).docx](#)

Kristen – this may be more than you need – I left a fair bit of the context in this before getting to what the risk estimate is and what it might mean. Kelly, Martha and Darcie reviewed.

**To:** Noonan, Jenny[Noonan.Jenny@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]; Bremer, Kristen[Bremer.Kristen@epa.gov]; Lassiter, Penny[Lassiter.Penny@epa.gov]; Keating, Martha[keating.martha@epa.gov]  
**Cc:** Koerber, Mike[Koerber.Mike@epa.gov]  
**From:** Wayland, Richard  
**Sent:** Fri 12/11/2015 1:17:18 PM  
**Subject:** RE: NATA

I can probably rearrange things to make this work.

Richard A. "Chet" Wayland | Director | Air Quality Assessment Division - Mail Code C304-02 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | Research Triangle Park, NC 27711 | Desk: 919-541-4603 | Cell: Ex. 6 - Personal Privacy Fax: 919-541-4511 |

**From:** Noonan, Jenny  
**Sent:** Thursday, December 10, 2015 5:09 PM  
**To:** Rimer, Kelly <Rimer.Kelly@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Keating, Martha <keating.martha@epa.gov>; Wayland, Richard <Wayland.Richard@epa.gov>  
**Cc:** Koerber, Mike <Koerber.Mike@epa.gov>  
**Subject:** Fwd: NATA

Can folks make this work on Monday?

Sent from my iPhone

Begin forwarded message:

**From:** "Gray, David" <gray.david@epa.gov>  
**Date:** December 10, 2015 at 4:14:44 PM EST  
**To:** "Noonan, Jenny" <Noonan.Jenny@epa.gov>  
**Subject:** Fwd: NATA

Can we make 10 am CT Dallas?

Sent from my iPhone

Begin forwarded message:

**From:** Tegan Treadaway <Tegan.Treadaway@LA.GOV>  
**Date:** December 10, 2015 at 4:02:18 PM EST  
**To:** "Gray, David" <gray.david@epa.gov>

**Cc:** "Stenger, Wren" <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)>

**Subject: Re: NATA**

Does 10 work?

Sent from my iPhone

On Dec 10, 2015, at 2:38 PM, Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)> wrote:

What is the best time?

Sent from my iPhone

On Dec 10, 2015, at 12:23 PM, Tegan Treadaway  
<[Tegan.Treadaway@LA.GOV](mailto:Tegan.Treadaway@LA.GOV)> wrote:

David:

Can we schedule a call for Monday morning with staff to discuss this? DHH  
can participate as well.

Thank you,

Tegan Treadaway

225.572.5900

**From:** Cheryl Nolan

**Sent:** Wednesday, December 09, 2015 8:18 AM

**To:** Tegan Treadaway; Chance McNeely (DEQ)

**Subject:** FW: NATA

FYI

Thanks,

**Cheryl Sonnier Nolan**

**Administrator, Air Permits Division**

**Office of Environmental Services**

**Louisiana Department of Environmental Quality**

**Office: (225)219-3417**

"The struggle of today, is not altogether for today-it is for a vast future also." Abraham Lincoln 12/3/1861

**From:** Gray, David [<mailto:gray.david@epa.gov>]

**Sent:** Wednesday, December 09, 2015 7:58 AM

**To:** Cheryl Nolan; Gregory Langley; Stenger, Wren

**Subject:** NATA

**Hi Cheryl and Greg,**

**I wanted to share the latest information on the NATA release. I understand it is scheduled for Dec 17 and that you should have password protected access to the online data today. Below are a few highlights that I pulled together. They are draft and I ask that they not be circulated broadly. We are still working next steps and more robust plan.**

**It might be a good idea for us to get on a conference call to discuss (perhaps have LDHH join too) before the announcement. I can get our team as well HQ OAR on a call if you agree.**

**Best,**

**David**

**DRAFT - DO NOT CITE, QUOTE OR DISTRIBUTE**

**2011 NATA CHLOROPRENE COMMUNICATIONS PLAN**

December 2015

**OVERVIEW**

**Ex. 5 - Deliberative**

**Ex. 5 - Deliberative**

# **Ex. 5 - Deliberative**

Sent from my iPhone

**To:** Bremer, Kristen[Bremer.Kristen@epa.gov]; Millett, John[Millett.John@epa.gov]  
**Cc:** Smith, Darcie[Smith.Darcie@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]; Noonan, Jenny[Noonan.Jenny@epa.gov]  
**From:** Gray, David  
**Sent:** Mon 12/7/2015 7:21:33 PM  
**Subject:** RE: Draft Communications Plan for LaPlace, LA  
[DuPont LaPlace chloroprene major sources.xlsx](#)

FYI for the 114 letter. The sources at this facility are broader than stacks. Attached is a break out from our folks.

Attached is the 2014 LDEQ emissions inventory for chloroprene sources at the Dupont facility in LaPlace, LA. In summary about 24 tons are being emitted from area/fugitive sources such as building exhaust fans, 21 tons are being released from vents, and 84 tons are coming from stacks. Approximately half the emissions are coming from the top 4 to 5 sources.

**Ex. 5 - Deliberative**

**Ex. 5 - Deliberative**

**To:** Walton, Tom[Walton.Tom@epa.gov]  
**Cc:** Weatherhead, Darryl[Weatherhead.Darryl@epa.gov]; Diem, Art[Diem.Art@epa.gov]  
**From:** Smith, Darcie  
**Sent:** Mon 11/16/2015 10:40:24 PM  
**Subject:** RE: Facility research

Thank you Tom. We'll let you know if we have additional questions.

Darcie Smith

U.S. EPA/OAQPS/HEID/ATAG

Mail Drop C539-02

109 TW Alexander Dr.

RTP, NC 27711

(919) 541-2076

**From:** Walton, Tom  
**Sent:** Friday, November 13, 2015 4:07 PM  
**To:** Smith, Darcie <Smith.Darcie@epa.gov>  
**Cc:** Weatherhead, Darryl <Weatherhead.Darryl@epa.gov>; Diem, Art <Diem.Art@epa.gov>  
**Subject:** Re: Facility research

Darcie,

The attached file along with the attachments Art sent help to begin to answer your questions. I looked at DuPont reports available on line and news releases. I highlighted portions to show my basis for the following tentative conclusions. DuPont doesn't give much disaggregated information

- The plant involved in the neoprene (chloroprene rubber) production had 235 employees in December 2014. All are supposed to be offered jobs with the new owner



- DuPont will continue to serve as landlord at the Pontchartrain Works site, which also houses production for DuPont Protection Technologies. That unit makes Kevlar, the protective synthetic fiber used in the bullet-resistant vests worn by police and military personnel. The segment has 150 employees, all of which will also remain in LaPlace, the company said.
- Neoprene sales comprised less than 5 percent of DuPont Performance Polymers' sales in 2013
- \$4.2 billion estimate DuPont Performance Polymers unit
- Neoprene sales in 2013 may be less than \$210 million
- Even though the initial announcement was for the sale to be in the first half of this year I suspect international regulatory approval has not yet finished. A number of overseas competition agencies are considering or have considered the acquisition. So far, the relevant agencies in the United States, Germany, Taiwan and Ukraine have cleared the transaction. The transaction is still being reviewed in a number of other jurisdictions from a March 2015 report.

Please let me know if you have any questions.

Tom

---

**From:** Smith, Darcie  
**Sent:** Thursday, November 12, 2015 5:39 PM  
**To:** Walton, Tom  
**Cc:** Weatherhead, Darryl; Diem, Art  
**Subject:** Facility research

Hi Tom –

Can you help us with some economic information about a facility? It is the DuPont Pontchartrain Works facility in LaPlace, LA. (Sometimes it is also called the DuPont Pontchartrain Site.) It has a variety of MACT source categories present (e.g., HON, MON, styrene butadiene rubber production), and the one we are most interested in is the Neoprene production category. We would like some basic (??) info – no. of employees, status of their sale to a Japanese company (we think it is complete), pct of worldwide production, pct neoprene is of facility production/sales, etc. We don't have specific questions that we're trying to answer, but as we've been talking to people they've asked all kinds of questions along these lines. If you need more context, please give me a call and I can provide more details.

Thanks,

Darcie

Darcie Smith

U.S. EPA/OAQPS/HEID/ATAG

Mail Drop C539-02

109 TW Alexander Dr.

RTP, NC 27711

(919) 541-2076

**To:** Smith, Darcie[Smith.Darcie@epa.gov]  
**Cc:** Weatherhead, Darryl[Weatherhead.Darryl@epa.gov]; Diem, Art[Diem.Art@epa.gov]  
**From:** Walton, Tom  
**Sent:** Fri 11/13/2015 9:07:29 PM  
**Subject:** Re: Facility research  
[neoprene.docx](#)

Darcie,

The attached file along with the attachments Art sent help to begin to answer your questions. I looked at DuPont reports available on line and news releases. I highlighted portions to show my basis for the following tentative conclusions. DuPont doesn't give much disaggregated information

- The plant involved in the neoprene (chloroprene rubber) production had 235 employees in December 2014. All are supposed to be offered jobs with the new owner
- DuPont will continue to serve as landlord at the Pontchartrain Works site, which also houses production for DuPont Protection Technologies. That unit makes Kevlar, the protective synthetic fiber used in the bullet-resistant vests worn by police and military personnel. The segment has 150 employees, all of which will also remain in LaPlace, the company said.
- Neoprene sales comprised less than 5 percent of DuPont Performance Polymers' sales in 2013
- \$4.2 billion estimate DuPont Performance Polymers unit
- Neoprene sales in 2013 may be less than \$210 million
- Even though the initial announcement was for the sale to be in the first half of this year I suspect international regulatory approval has not yet finished. A number of overseas competition agencies are considering or have considered the acquisition. So far, the relevant agencies in the United States, Germany, Taiwan and Ukraine have cleared the transaction. The transaction is still being reviewed in a number of other jurisdictions from a March 2015 report.

Please let me know if you have any questions.

Tom

---

**From:** Smith, Darcie  
**Sent:** Thursday, November 12, 2015 5:39 PM  
**To:** Walton, Tom  
**Cc:** Weatherhead, Darryl; Diem, Art  
**Subject:** Facility research

Hi Tom –

Can you help us with some economic information about a facility? It is the DuPont Pontchartrain Works facility in LaPlace, LA. (Sometimes it is also called the DuPont Pontchartrain Site.) It has a variety of MACT source categories present (e.g., HON, MON, styrene butadiene rubber production), and the one we are most interested in is the Neoprene production category. We would like some basic (??) info – no. of employees, status of their sale to a Japanese company (we think it is complete), pct of worldwide production, pct neoprene is of facility production/sales, etc. We don't have specific questions that we're trying to answer, but as we've been talking to people they've asked all kinds of questions along these lines. If you need more context, please give me a call and I can provide more details.

Thanks,

Darcie

Darcie Smith

U.S. EPA/OAQPS/HEID/ATAG

Mail Drop C539-02

109 TW Alexander Dr.

RTP, NC 27711

(919) 541-2076

**To:** Diem, Art[Diem.Art@epa.gov]  
**From:** Drewry, Josiah  
**Sent:** Wed 10/7/2015 5:56:37 PM  
**Subject:** RE: Research interest  
[32629 Rubber Product Manufacturing in the US Industry Report\(1\).pdf](#)  
[32522 Synthetic Fiber Manufacturing in the US Industry Report.pdf](#)  
[32629 Rubber Product Manufacturing in the US Industry Report.pdf](#)  
[2652.pdf](#)

Hi Art,

Nice meeting you today. Attached are a couple screenshots from F&S and IBISWorld reports.

--

Josiah Mark Drewry  
Librarian for Business, Economics, and Sociology  
Davis Library, Research and Instructional Services  
UNC Chapel Hill, CB #3922  
Chapel Hill, NC 27514-8890  
919-962-3694 (Office)  
919-962-1151 (Dept.)

## Ex. 6 - Personal Privacy

---

**From:** Diem, Art [Diem.Art@epa.gov]  
**Sent:** Wednesday, October 07, 2015 11:39 AM  
**To:** Drewry, Josiah  
**Subject:** Research interest

Hi Josiah,

Thanks for helping me with my research. Here's the information I'm looking for:

**Elastomers: Applications and Global Markets (BCC Research) – Report# CHM056A, 2015 (257pp.)**

I think this is available via Frost & Sullivan.

I am interested in pp. 41, 42, 75-77, 105, 106, 135-137, 164-166, 193, 194.

See you around 1:00pm.

Thanks,

Art

-----  
Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division,

Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185

**To:** Diem, Art[Diem.Art@epa.gov]  
**From:** Drewry, Josiah  
**Sent:** Wed 10/7/2015 5:30:46 PM  
**Subject:** RE: Research interest  
CHM056A.pdf

--

Josiah Mark Drewry  
Librarian for Business, Economics, and Sociology  
Davis Library, Research and Instructional Services  
UNC Chapel Hill, CB #3922  
Chapel Hill, NC 27514-8890  
919-962-3694 (Office)  
919-962-1151 (Dept.)

## **Ex. 6 - Personal Privacy**

---

**From:** Diem, Art [Diem.Art@epa.gov]  
**Sent:** Wednesday, October 07, 2015 11:39 AM  
**To:** Drewry, Josiah  
**Subject:** Research interest

Hi Josiah,

Thanks for helping me with my research. Here's the information I'm looking for:

**Elastomers: Applications and Global Markets (BCC Research) – Report# CHM056A, 2015 (257pp.)**

I think this is available via Frost & Sullivan.

I am interested in pp. 41, 42, 75-77, 105, 106, 135-137, 164-166, 193, 194.

See you around 1:00pm.

Thanks,

Art

-----

Art Diem, Environmental Engineer

USEPA Office of Air Quality Planning and Standards,

Sector Policies and Programs Division,

Refining and Chemicals Group

Diem.Art@epa.gov

919-541-1185



**To:** McCabe, Janet[McCabe.Janet@epa.gov]  
**Cc:** Stewart, Lori[Stewart.Lori@epa.gov]; Cyran, Carissa[Cyran.Carissa@epa.gov]  
**From:** McCoy, Britney  
**Sent:** Fri 12/4/2015 10:24:17 PM  
**Subject:** E-Folder of Rules (and Other Documents) - December 4, 2015  
[Subpart W leak detection proposal cover note 12\\_3\\_15 clean.docx](#)  
[Subpart W 2015 leaker EmF revisions preamble 12\\_3\\_15 clean.docx](#)  
[EPA Response to Interagency Working Comments 11-30-15.docx](#)  
[SAN 5835 GHGRP Amendments Proposal 11-30-15 mkup.docx](#)  
[Reducing GHG Emissions by Advancing Industrial EE 2000-2015 DRAFT.PDF](#)  
[NATA pager Administrator 12\\_3\\_15.docx](#)  
[2011 NATA Roll Out Plan 12\\_3\\_15.docx](#)  
[Chloroprene Comm Plan 12\\_3\\_15.docx](#)  
[WhitePaper BGO3 v11-24-2015.docx](#)  
[RH NPRM 12\\_03 clean with RLSO rule text.docx](#)

Hi Janet,

Below I've attached the electronic version of the documents packaged today.

1. Regional Haze
2. GHGRP - Subpart W (Leak Detection)
3. GHGRP - General Revisions (Note: OAP wants to highlight EPA responses to Interagency comments here.)
4. Ozone Background (White paper)
5. Energy Star Report
6. NATA Rollout Materials

Have a great time in Paris.

Britney

**To:** McCabe, Janet[McCabe.Janet@epa.gov]  
**Cc:** Jordan, Deborah[Jordan.Deborah@epa.gov]  
**From:** Page, Steve  
**Sent:** Thur 12/3/2015 11:07:34 PM  
**Subject:** 2011 NATA one pager, NATA roll out and NATA Chloroprene comm plan  
[NATA pager Administrator 12\\_3\\_15.docx](#)  
[2011 NATA Roll Out Plan 12\\_3\\_15.docx](#)  
[Chloroprene Comm Plan 12\\_3\\_15.docx](#)

Janet,

As requested, I have attached:

- [REDACTED] One pager on 2011 NATA that highlights the chloroprene issue and action plan;  
and
- [REDACTED] NATA rollout plan (still a work in progress).

Note I am also including a Chloroprene communications plan as FYI.

I will follow-up with you on these documents at tomorrow's 1-on-1.

**To:** Gray, David[gray.david@epa.gov]  
**From:** McCabe, Janet  
**Sent:** Wed 12/16/2015 7:47:43 PM  
**Subject:** RE: Request for call from LA members on NATA

David—Nichole asked me to mention on the call that Ron Curry is on the road today and regrets he could not join us—that work for you?

**From:** Gray, David  
**Sent:** Wednesday, December 16, 2015 9:21 AM  
**To:** Atkinson, Emily <Atkinson.Emily@epa.gov>  
**Cc:** Sasser, Erika <Sasser.Erika@epa.gov>; Niebling, William <Niebling.William@epa.gov>; McCabe, Janet <McCabe.Janet@epa.gov>; Jordan, Deborah <Jordan.Deborah@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Stewart, Lori <Stewart.Lori@epa.gov>; Terry, Sara <Terry.Sara@epa.gov>; Ashley, Jackie <Ashley.Jackie@epa.gov>; Millett, John <Millett.John@epa.gov>; Lubetsky, Jonathan <Lubetsky.Jonathan@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>; Noonan, Jenny <Noonan.Jenny@epa.gov>; Rimer, Kelly <Rimer.Kelly@epa.gov>; Bremer, Kristen <Bremer.Kristen@epa.gov>; Page, Steve <Page.Steve@epa.gov>  
**Subject:** Re: Request for call from LA members on NATA

I will plan to call in

Sent from my iPhone

On Dec 16, 2015, at 7:20 AM, Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)> wrote:

We are holding today at 4:30pm ET for a 30 minute call. Please let me know if this is confirmed on your end and who I should include on the meeting notice.

Thank you.

Emily

Emily Atkinson  
Staff Assistant

Immediate Office of the Acting Assistant Administrator

Office of Air and Radiation, USEPA  
Room 5406B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

**From:** Sasser, Erika

**Sent:** Tuesday, December 15, 2015 7:10 PM

**To:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>

**Cc:** McCabe, Janet <[McCabe.Janet@epa.gov](mailto:McCabe.Janet@epa.gov)>; Jordan, Deborah

<[Jordan.Deborah@epa.gov](mailto:Jordan.Deborah@epa.gov)>; Koerber, Mike <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>; Stewart, Lori

<[Stewart.Lori@epa.gov](mailto:Stewart.Lori@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>; Ashley, Jackie

<[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>; Millett, John

<[Millett.John@epa.gov](mailto:Millett.John@epa.gov)>; Lubetsky, Jonathan <[Lubetsky.Jonathan@epa.gov](mailto:Lubetsky.Jonathan@epa.gov)>; Cyran,

Carissa <[Cyran.Carissa@epa.gov](mailto:Cyran.Carissa@epa.gov)>; Noonan, Jenny <[Noonan.Jenny@epa.gov](mailto:Noonan.Jenny@epa.gov)>; Rimer,

Kelly <[Rimer.Kelly@epa.gov](mailto:Rimer.Kelly@epa.gov)>; Bremer, Kristen <[Bremer.Kristen@epa.gov](mailto:Bremer.Kristen@epa.gov)>; Page, Steve

<[Page.Steve@epa.gov](mailto:Page.Steve@epa.gov)>; Gray, David <[gray.david@epa.gov](mailto:gray.david@epa.gov)>

**Subject:** Re: Request for call from LA members on NATA

Yes, we will get that ready. We will coordinate with R6--David Gray has been doing a great job leading the stakeholder calls in the region and may have a set of talking points we can work from.

From Erika's iPhone

On Dec 15, 2015, at 6:25 PM, Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)> wrote:

Hi all – There is a request from four members of the Louisiana congressional delegation for a Member-level call at 430pm tomorrow on LaPlace / NATA. I have held 430pm on Janet's calendar for the call, but we will obviously want some OAQPS support. I expect R6 will join as well. There's a chance this will get turned into a Region-OAQPS call but the working plan is a Janet-OAQPS-Region call.

I don't know the exact prompt but I think it will be to brief them and answer questions, not their coming with a particular agenda. I'm not sure the state of our TPs and Q&As but whoever is leading it (Janet or Ron) will need a script. Maybe I can ask OAQPS to prepare that if you don't already have something ready?

Thanks.

-Wm.

**From:** Bailey, KevinJ  
**Sent:** Tuesday, December 15, 2015 5:26 PM  
**To:** Ashley, Jackie <[Ashley.Jackie@epa.gov](mailto:Ashley.Jackie@epa.gov)>; Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>;  
Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>  
**Cc:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>  
**Subject:** Request for call from LA members on NATA

We received a request from Rep. Graves' office asking for a phone call at 4:30pm tomorrow on chloroprene and the NATA modeling. The call would include Reps. Graves, Richmond, Boustany, and Senator Cassidy (Pat got a separate call from Sen. Cassidy's office asking for a call as well). They've been altered to the announcement happening later this week, I'm assuming from the state folks.

We're working with Nichole to figure out how to best handle, but may need to do the call tomorrow and wanted to put folks on notice in case that's the direction we get. More to come from either Pat or me...

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144



**To:** David Gray[Gray.David@epa.gov]  
**Cc:** Harrison, Melissa[Harrison.Melissa@epa.gov]  
**From:** Millett, John  
**Sent:** Thur 12/17/2015 9:44:37 PM  
**Subject:** FW: chloroprene talking points  
Chloroprene Talking Points 12.17.15 FINAL Clean.doc

Fyi – we were thinking we might see something from ATSDR today, but it's looking more and more like Friday.

**From:** Deener, Kathleen  
**Sent:** Thursday, December 17, 2015 4:42 PM  
**To:** Distefano, Nichole <DiStefano.Nichole@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>  
**Cc:** Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Piantanida, David <Piantanida.David@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>; Millett, John <Millett.John@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Gwinn, Maureen <gwinn.maureen@epa.gov>; Vandenberg, John <Vandenberg.John@epa.gov>  
**Subject:** chloroprene talking points

Hi Nichole and Melissa –

Attached are some talking points about the chloroprene IRIS assessment. Please let me know if you have questions or need additional information. Many thanks to Lou D'Amico in NCEA for putting these together.

Thanks,

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | (mobile)

Ex. 6 - Personal Privacy

deener.kathleen@epa.gov



**To:** Kristen Bremer[Bremer.Kristen@epa.gov]; Andrea Drinkard[Drinkard.Andrea@epa.gov]  
**From:** Millett, John  
**Sent:** Thur 12/17/2015 9:43:30 PM  
**Subject:** FW: chloroprene talking points  
Chloroprene Talking Points 12.17.15 FINAL Clean.doc

Fyi – any word from ATSDR?

**From:** Deener, Kathleen  
**Sent:** Thursday, December 17, 2015 4:42 PM  
**To:** Distefano, Nichole <DiStefano.Nichole@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>  
**Cc:** Hubbard, Carolyn <Hubbard.Carolyn@epa.gov>; Piantanida, David <Piantanida.David@epa.gov>; Blackburn, Elizabeth <Blackburn.Elizabeth@epa.gov>; Millett, John <Millett.John@epa.gov>; D'Amico, Louis <DAmico.Louis@epa.gov>; Gwinn, Maureen <gwinn.maureen@epa.gov>; Vandenberg, John <Vandenberg.John@epa.gov>  
**Subject:** chloroprene talking points

Hi Nichole and Melissa –

Attached are some talking points about the chloroprene IRIS assessment. Please let me know if you have questions or need additional information. Many thanks to Lou D'Amico in NCEA for putting these together.

Thanks,

Kacee Deener, MPH

Senior Science Advisor

Office of Research and Development

(ph) 202.564.1990 | (mobile) **Ex. 6 - Personal Privacy**

[deener.kathleen@epa.gov](mailto:deener.kathleen@epa.gov)



**To:** Stewart, Lori[Stewart.Lori@epa.gov]  
**From:** Millett, John  
**Sent:** Thur 12/17/2015 6:37:35 PM  
**Subject:** RE: final NATA material?  
[NATA 2011 Fact Sheet - FINAL - clean.docx](#)  
[NATA LaPlace Communication Strategy v6.docx](#)  
[NATA2011 internal qs and as draft v2.doc](#)  
[2011 NATA KEY MESSAGEV3.docx](#)

Yes – I handed them hard copies just before 11 – here they are electronically – Debbie says they look good – need to get Janet’s OK before posting –

**From:** Stewart, Lori  
**Sent:** Thursday, December 17, 2015 1:29 PM  
**To:** Millett, John <Millett.John@epa.gov>  
**Subject:** final NATA material?

John, I meant to send a note earlier that Janet (and Debbie) was asking for a copy of the final NATA roll-out material. Can you please email that when you get a chance? Thanks.

**To:** Vandenberg, John[Vandenberg.John@epa.gov]  
**From:** Millett, John  
**Sent:** Wed 12/16/2015 9:13:13 PM  
**Subject:** Fwd: Call-in # for 4:30 mtg  
[NATA LaPlace Communication Strategy v6.docx](#)  
[ATT00001.htm](#)

Updated. Bullets 2 and 3, and at the bottom of page 1 are new from the last version.

John Millett  
202.510.1822

Begin forwarded message:

**From:** "Millett, John" <Millett.John@epa.gov>  
**Date:** December 16, 2015 at 3:55:42 PM EST  
**To:** "Niebling, William" <Niebling.William@epa.gov>, "Terry, Sara" <Terry.Sara@epa.gov>, "Bailey, KevinJ" <Bailey.KevinJ@epa.gov>  
**Cc:** "Bremer, Kristen" <Bremer.Kristen@epa.gov>  
**Subject:** RE: Call-in # for 4:30 mtg

## Ex. 5 - Deliberative

**From:** Niebling, William  
**Sent:** Wednesday, December 16, 2015 3:49 PM  
**To:** Terry, Sara <Terry.Sara@epa.gov>; Bailey, KevinJ <Bailey.KevinJ@epa.gov>  
**Cc:** Bremer, Kristen <Bremer.Kristen@epa.gov>; Millett, John <Millett.John@epa.gov>  
**Subject:** RE: Call-in # for 4:30 mtg

+ Millett, who had TPs I thought he might circulate?

Sara, I can run it or you all can, up to you.

**From:** Terry, Sara  
**Sent:** Wednesday, December 16, 2015 3:48 PM  
**To:** Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Bremer, Kristen <[Bremer.Kristen@epa.gov](mailto:Bremer.Kristen@epa.gov)>  
**Subject:** RE: Call-in # for 4:30 mtg

I'm bringing in the folks who I think will be facilitating the 4:00.

Will, Kristen, is there an intention to share any written materials in advance?

For the 4:00, who will do the roll call and talking?

Sara

**From:** Bailey, KevinJ  
**Sent:** Wednesday, December 16, 2015 3:16 PM  
**To:** Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>  
**Subject:** RE: Call-in # for 4:30 mtg

Thanks, Sara. Also, do you know if there will be materials for the pre-brief?

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**From:** Terry, Sara  
**Sent:** Wednesday, December 16, 2015 3:14 PM  
**To:** Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>  
**Subject:** RE: Call-in # for 4:30 mtg

Done.

**From:** Bailey, KevinJ  
**Sent:** Wednesday, December 16, 2015 2:48 PM  
**To:** Terry, Sara <[Terry.Sara@epa.gov](mailto:Terry.Sara@epa.gov)>  
**Subject:** FW: Call-in # for 4:30 mtg

Sara,

Another change....see William's number below. Can we use his number for the pre-brief???  
Thanks for your assistance in setting this up! Never a dull moment...

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**From:** Niebling, William  
**Sent:** Wednesday, December 16, 2015 11:54 AM  
**To:** Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>; Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Subject:** RE: Call-in # for 4:30 mtg

## Ex. 6 - Personal Privacy

-Wm.

**From:** Haman, Patricia  
**Sent:** Wednesday, December 16, 2015 11:52 AM  
**To:** Bailey, KevinJ <[Bailey.KevinJ@epa.gov](mailto:Bailey.KevinJ@epa.gov)>; Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>  
**Subject:** RE: Call-in # for 4:30 mtg

Thanks! I will let the members know.

Patricia Haman

Office of Congressional Affairs

U.S. EPA

202-564-2806

**From:** Bailey, KevinJ  
**Sent:** Wednesday, December 16, 2015 11:50 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>

**Subject:** Re: Call-in # for 4:30 mtg

Thanks, Emily. Let's use the following:

## Ex. 6 - Personal Privacy

Pat/William- this is the same call-in info being used for the pre-brief so we'll be sure to note that and not run over.

Sent from my iPhone

On Dec 16, 2015, at 11:37 AM, Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)> wrote:

You all are welcome to use one of your call in numbers. Just let me know what it is along with the pin and then I can open the line.

Emily Atkinson  
Staff Assistant

Immediate Office of the Acting Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406B, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-1850  
Email: [atkinson.emily@epa.gov](mailto:atkinson.emily@epa.gov)

**From:** Bailey, KevinJ  
**Sent:** Wednesday, December 16, 2015 11:30 AM  
**To:** Atkinson, Emily <[Atkinson.Emily@epa.gov](mailto:Atkinson.Emily@epa.gov)>  
**Cc:** Niebling, William <[Niebling.William@epa.gov](mailto:Niebling.William@epa.gov)>; Haman, Patricia <[Haman.Patricia@epa.gov](mailto:Haman.Patricia@epa.gov)>  
**Subject:** Call-in # for 4:30 mtg



Hey Emily,

Is there a number you'd like us to provide the members who Janet will be speaking with today at 4:30? I've listed the members below.

Sen. Bill Cassidy

Rep. Garret Graves

Rep. Charles Boustany

Kevin J. Bailey

Congressional Liaison/Air Team

Office of Congressional Affairs

U.S. Environmental Protection Agency

(o) 202.564.2998

(f) 202.501.0144

**To:** Stewart.Lori@epa.gov[Stewart.Lori@epa.gov]  
**From:** Millett, John  
**Sent:** Wed 12/16/2015 4:07:41 PM  
**Subject:** FW: Talkers/q-a for La. call  
LaPlace -- DRAFT TPs and q-a 12-16- 2011.docx

Hi Lori – This is what David Gray is currently working with. OAQPS is looking this over and either fold this in to what they’re working on, or add to and edit this.

**From:** Millett, John  
**Sent:** Wednesday, December 16, 2015 11:04 AM  
**To:** Sara Terry <Terry.Sara@epa.gov>  
**Subject:** Talkers/q-a for La. call

Here’s the word doc with the messages, TPs and q/a that R6 is currently working with – to review and combine with whatever else is being prepared by OAQPS for the afternoon’s call.

~~~~~

John Millett

Director, OAR Communications

Desk: 202-564-2903

Cell:

Ex. 6 - Personal Privacy

To: Jordan, Deborah[Jordan.Deborah@epa.gov]; Niebling, William[Niebling.William@epa.gov]
From: Millett, John
Sent: Mon 12/14/2015 11:08:21 PM
Subject: FW: Updated LaPlace Comms Plan
NATA LaPlace Communication Strategy v3.docx

Sorry – forgot to cc you on this work in progress . . .

From: Millett, John
Sent: Monday, December 14, 2015 3:34 PM
To: OAR Briefings <OAR_Briefings@epa.gov>
Subject: FW: Updated LaPlace Comms Plan

For Janet's book tonight – thanks!

From: Gray, David
Sent: Monday, December 14, 2015 8:19 AM
To: Bremer, Kristen <Bremer.Kristen@epa.gov>; Millett, John <Millett.John@epa.gov>; Drinkard, Andrea <Drinkard.Andrea@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Purchia, Liz <Purchia.Liz@epa.gov>; Harrison, Melissa <Harrison.Melissa@epa.gov>
Cc: Noonan, Jenny <Noonan.Jenny@epa.gov>
Subject: RE: Updated LaPlace Comms Plan

Here are some revisions from me. I am also adding Nancy, Liz and Melissa to the mix.

David

From: Bremer, Kristen
Sent: Friday, December 11, 2015 4:25 PM
To: Gray, David; Millett, John; Drinkard, Andrea
Cc: Noonan, Jenny

Subject: Updated LaPlace Comms Plan

I added in John's and my edits to the communications plan (attached). Obviously, the outreach schedule has changed quite a bit from this morning, so hopefully David can provide updates.

I sent along the public Qs&As (e.g., Is it safe for my child to go to school? My family member has cancer, is it from the plant?) to Deborah Burgin at ATSDR and she will be working on responses. She is also checking on the availability for a CDC physician to attend the public meetings in January; I'll keep you posted. Since ATSDR will likely be participating in the public meetings, I also forwarded the LA agencies webinar invite to Deborah and George; it might be helpful for them to listen in.

Ex. 6 - Personal Privacy

Kristen Bremer

Policy Analysis & Communications

U.S. EPA, Office of Air Quality Planning & Standards

Email: bremer.kristen@epa.gov

Phone: 919.541.9424

Cell: **Ex. 6 - Personal Privacy**

To: Kelly.Petersen@LA.gov[Kelly.Petersen@LA.gov]
Cc: Palma, Ted[Palma.Ted@epa.gov]; Morris, Mark[Morris.Mark@epa.gov]
From: Strum, Madeleine
Sent: Wed 7/1/2015 3:26:13 AM
Subject: RE: priority facility emissions question
[eis_8026611.xlsx](#)

Kelly,

I think perhaps we should next ensure that the stack parameters are as accurate as possible.

Can you and Doris look at the attached modeling file for all chloroprene records for the facility?– I sorted all the chloroprene emissions from high to low and highlighted the top few plus the pinkish highlight is a high emissions release that was characterized as a fugitive – since column R (“erptype”) is equal to 1 which means it would have been modeled as a low level fugitive source (which could cause higher risk than a tall stack).

Could you make sure the stack heights are correct as well for the highest emission stacks?

Thanks

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

From: Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]
Sent: Tuesday, June 30, 2015 2:14 PM
To: Strum, Madeleine
Subject: FW: priority facility emissions question

Madeline,

EI DuPont has confirmed their values.

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Doris.B.Grego@dupont.com [<mailto:Doris.B.Grego@dupont.com>]

Sent: Tuesday, June 30, 2015 1:09 PM

To: Kelly Petersen

Subject: RE: priority facility emissions question

Kelly, sorry for the late response, I have been on vacation. According to my files, for 2011 we reported the following amounts:

TRI EPA – 260,268 pounds of chloroprene to the air

ERIC – 260,260 pounds of chloroprene to the air

Attached is a copy of the TRI form for chloroprene (pages 1 and 2) and the ERIC summary for that year. Please let me know if you have any questions.

Doris B. Grego, P.E.

Senior Environmental Consultant

985-536-5437



From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]
Sent: Thursday, June 25, 2015 10:08 AM
To: GREGO, DORIS B
Subject: FW: priority facility emissions question

Doris,

EPA has asked that we verify the 2011 emissions below. They have indicated that the reported value is significantly higher than the TRI values reported. Also, in the 2011 NEI v2, this facility has the highest chloroprene and the facility total is higher by the 2nd highest facility by 2 orders of magnitude.

If you could check on this and get back with me, I would appreciate it.

Thanks,

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]

Sent: Wednesday, June 24, 2015 2:47 PM

To: Kelly Petersen

Cc: Palma, Ted

Subject: priority facility emissions question

Kelly

Can you verify the emissions of chloroprene from the below facility?

Facility ID	FIPSTribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million)	Facility Emissions (tpy)	Facility Name	County StateName	Comm
8026612	2095	Cancer risk	Chloroprene	6.044	30.077	E I DuPont de Nemours & Co - LA Pontchartrain Site	St. John the Baptist	

Thanks

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

To: Kelly.Petersen@LA.gov[Kelly.Petersen@LA.gov]
Cc: Palma, Ted[Palma.Ted@epa.gov]; Morris, Mark[Morris.Mark@epa.gov]
From: Strum, Madeleine
Sent: Thur 6/25/2015 3:30:14 PM
Subject: RE: priority facility emissions question

Kelly,

Thanks for following up. No it will not be a problem to wait. We just need to fix it before the final NATA. You might call this getting a head start on the NATA preview. I am hoping we'll get all the preview files posted after the July 4 holiday.

Thanks again,

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

From: Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]
Sent: Thursday, June 25, 2015 11:15 AM
To: Strum, Madeleine
Cc: Palma, Ted; Morris, Mark
Subject: RE: priority facility emissions question

I have contacted my contact for this facility, but it seems she will be out of the country until next Tuesday. Will this be a problem?

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]

Sent: Thursday, June 25, 2015 8:37 AM

To: Kelly Petersen

Cc: Palma, Ted; Morris, Mark

Subject: RE: priority facility emissions question

Importance: High

Kelly,

I checked TRI and it is way lower. Also it is important that we use actual and not permitted emissions. Could you look more into this one?

They are under 2 different TRI ids (not sure why)

1. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70068DPNTD560HW

<u>CHLOROPRENE</u>	<u>AIR FUG</u>	Pounds	2011
(TRI Chemical ID: 000126998)			5568
<u>CHLOROPRENE</u>	<u>AIR STACK</u>	Pounds	25470
(TRI Chemical ID: 000126998)			

2. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70069DPNTPHIGHW

They have no reported emissions for 2011

		2013	2012	2011
<u>CHLOROPRENE</u>	<u>AIR FUG</u>	Pounds	12000	21278 NR
(TRI Chemical ID: 000126998)				
<u>CHLOROPRENE</u>	<u>AIR STACK</u>	Pounds	24000	228452 NR
(TRI Chemical ID: 000126998)				

In the 2011 NEI v2, this facility has the highest chloroprene and the facility total is higher by the 2nd highest facility by 2 orders of magnitude. The emissions really don't seem correct.

EIS Identif	Program System Code	Region	State	County	State and County FIPS	Site Name	NAICS Codes	Facility Type	Latitude	Longitude	Address	City	State	12695
802661	LADEQ08	6LA	St. John the Baptist	22095	5E I DuPont de Nemours & Co - Pontchartrain Site	325212			30.05674		586 Hwy 44	Laplace	LA	2601
735471	LADEQ08	6LA	East Baton Rouge	22033	Formosa Plastics Corp Louisiana	325212	Plastic, Resin, or Rubber Products Plant		30.50172		N end of Gulf States Rd	Baton Rouge	LA	13
808471	NCDAQ	4NC	Granville	37077	Bridgestone-Bandag, LLC	326212			36.29622		505 West Industry Drive	Oxford	NC	338.2
625291	MSDEQ	4MS	Tishomingo	28141	International Converter	322220			34.8148		4309 Paul Edmondson Drive	luka	MS	317
758671	TXCEQ	6TX	Taylor	48441	ABILENE PLANT	326212	Plastic, Resin, or Rubber Products Plant		32.42878	99.650	ON FM 18 W OF ELMDALE RD	ABILENE	TX	2
106256	NCDAQ	4NC	Ashe	37009	The Gates Corporation	326212	Plastic, Resin, or Rubber Products Plant		36.4259		401 Gates Lane	Jefferson	NC	152
136106	LADEQ08	6LA	Iberville	22047	Shintech Louisiana LLC - Plaquemine PVC Plant	325212	Plastic, Resin, or Rubber Products Plant		30.2594		26270 Hwy 405	Plaquemine	LA	112.6
736921	MODNR	7MO	Greene	29077	TRANSMISSION PRODUCTS INC- SPRINGFIELD	326212	Automobile/Truck or Parts Plant		37.16399		2601 W BATTLEFIELD	SPRINGFIELD	MO	41.
779031	NCFCEAD	4NC	Forsyth	37067	HIGHLANDS INDUSTRIES	3133	Textile, Yarn, or Carpet Plant		36.12031		215 DRUMMOND ST.	KERNERSVILLE	NC	35.22
563341	TXCEQ	6TX	Calhoun	48057	FORMOSA POINT COMFORT PLANT	325212	Plastic, Resin, or Rubber Products Plant		28.6753		201 FORMOSA DR	POINT COMFORT	TX	27
100021	ADEM	4AL	Russell	1113	MeadWestvaco Mahrt Mill	322112	Pulp and Paper Plant		32.1774		4817 Hwy 165 S	Phenix City	AL	
744211	ADEM	4AL	Choctaw	1023	Georgia Pacific	322112	Pulp and Paper Plant		32.2272		7530 Hwy 114	Pennington	AL	
821481	LADEQ08	6LA	East Baton Rouge	22033	Georgia-Pacific Consumer Operations LLC - Port Hudson Operations Graphic Packaging	322112	Pulp and Paper Plant		30.65064		4000 W Mount Pleasant Rd	Zachary	LA	19.
573401	LADEQ08	6LA	Ouachita	22073	International Inc - West Monroe Mill #31	322112	Pulp and Paper Plant		32.4832		4000 Jonesboro Rd	West Monroe	LA	13.
722701	LADEQ08	6LA	Iberville	22047	Vinyls LLC - Plaquemine Division	325212	Plastic, Resin, or Rubber Products Plant		30.26543		26100 Hwy 405 S	Plaquemine	LA	10.5
836111	LADEQ08	6LA	Calcasieu	22019	Georgia Gulf Lake Charles LLC	325111			30.25228		4600 VCM Plant Rd	Westlake	LA	8.
655961	PADEP	3PA	Elk	42047	DOMTAR PAPER CO/JOHNSONBURG MILL	322112	Pulp and Paper Plant		41.49085		400 W CENTER ST	JOHNSONBURG	PA	8
665051	MIIDEQ	5MI	Oakland	26125	MAC VALVES INC	332911			42.519		30569 BECK ROAD	WIXOM	MI	7.
592941	KYDAQ	4KY	Marshall	21157	Westlake Vinyls Inc	325998			37.05111		2468 Industrial Pkwy	Calvert City	KY	

From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]
Sent: Wednesday, June 24, 2015 4:01 PM
To: Strum, Madeleine
Cc: Palma, Ted
Subject: RE: priority facility emissions question

They are permitted for 170 TPY, so I think it is valid. It is also consistent with that the new owner reported this year.

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: [\(225\) 219-3397](tel:225-219-3397) Fax: [\(225\) 325-8141](tel:225-325-8141) kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]
Sent: Wednesday, June 24, 2015 2:47 PM
To: Kelly Petersen
Cc: Palma, Ted
Subject: priority facility emissions question

Kelly

Can you verify the emissions of chloroprene from the below facility?

			Risk Value (cancer risk reported in a Facility Emissions)		Facility Name		County	
Facility ID	FIPS Tribal Parameter Code	Pollutant	million	(tpy)			State	Comm
80266122095		Cancer risk	Chloroprene	1816.04430.0778	E I DuPont de Nemours & Co - Pontchartrain Site		LA	St. John the Baptist

Thanks

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

To: Strum, Madeleine[Strum.Madeleine@epa.gov]
Cc: Palma, Ted[Palma.Ted@epa.gov]; Morris, Mark[Morris.Mark@epa.gov]
From: Kelly Petersen
Sent: Thur 6/25/2015 3:14:48 PM
Subject: RE: priority facility emissions question

I have contacted my contact for this facility, but it seems she will be out of the country until next Tuesday. Will this be a problem?

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [mailto:Strum.Madeleine@epa.gov]
Sent: Thursday, June 25, 2015 8:37 AM
To: Kelly Petersen
Cc: Palma, Ted; Morris, Mark
Subject: RE: priority facility emissions question
Importance: High

Kelly,

I checked TRI and it is way lower. Also it is important that we use actual and not permitted emissions. Could you look more into this one?

They are under 2 different TRI ids (not sure why)

1. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70068DPNTD560HW

CHLOROPRENE	AIR FUG	Pounds	2011
(TRI Chemical ID: 000126998)			5568
CHLOROPRENE	AIR STACK	Pounds	25470
(TRI Chemical ID: 000126998)			

2. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70069DPNTPHIGHW

They have no reported emissions for 2011

		2013	2012	2011
CHLOROPRENE (TRI Chemical ID: 000126998)	AIR FUG Pounds	12000	21278	NR
CHLOROPRENE (TRI Chemical ID: 000126998)	AIR STACK Pounds	24000	228452	NR

In the 2011 NEI v2, this facility has the highest chloroprene and the facility total is higher by the 2nd highest facility by 2 orders of magnitude. The emissions really don't seem correct.

EIS Identif	Program System Code	Region	State	County	State and County FIPS	Site Name	NAICS Codes	Facility Type	Latitude	Longitude	Address	City	State	12695
802661	LADEQ08	6LA	St. John the Baptist	22095	E I DuPont de Nemours & Co - Pontchartrain Site	325212	Plastic, Resin, or Rubber Products Plant	30.05674	586	Hwy 44	Laplace	LA	2601:	
735471	LADEQ08	6LA	East Baton Rouge	22033	Formosa Plastics Corp Louisiana	325211	Plastic, Resin, or Rubber Products Plant	30.50172	N end of Gulf States	Baton Rouge	LA	13'		
808471	NCDAQ	4NC	Granville	37077	Bridgestone-Bandag, LLC	326212	Plastic, Resin, or Rubber Products Plant	36.29622	505 West Industry	Oxford	NC	338.2:		
625291	MSDEQ	4MS	Tishomingo	28141	International Converter	322220	Plastic, Resin, or Rubber Products Plant	34.8148	4309 Paul	luka	MS	317		
758671	TXCEQ	6TX	Taylor	48441	ABILENE PLANT	326211	Plastic, Resin, or Rubber Products Plant	32.42878	99.65	ON FM 18 W OF ELMDALE RD	ABILENE	TX	2'	
106256	NCDAQ	4NC	Ashe	37009	The Gates Corporation	326220	Plastic, Resin, or Rubber Products Plant	36.4259	101 Gates Lane	Jefferson	NC	152		
136106	LADEQ08	6LA	Iberville	22047	Shintech Louisiana LLC - Plaquemine PVC Plant	325211	Plastic, Resin, or Rubber Products Plant	30.2594	26270 Hwy 405	Plaquemine	LA	112.6:		
736921	MODNR	7MO	Greene	29077	CARLISLE POWER TRANSMISSION PRODUCTS INC- SPRINGFIELD	326220	Automobile/Truck or Parts Plant	37.16399	2601 W	SPRINGFIELD	MO	41.:		
779031	NCFCEAD	4NC	Forsyth	37067	HIGHLANDS INDUSTRIES	3133	Textile, Yarn, or Carpet Plant	36.12031	215 DRUMMOND	KERNERSVILLE	NC	35.22:		
563341	TXCEQ	6TX	Calhoun	48057	FORMOSA POINT COMFORT PLANT	325211	Plastic, Resin, or Rubber Products Plant	28.6753	201 FORMOSA	POINT COMFORT	TX	27		
100021	ADEM	4AL	Russell	1113	MeadWestvaco Mahrt Mill	322111	Pulp and Paper Plant	32.1774	1817 Hwy 165 S	Phenix City	AL	:		

744211	LADEM	4AL	Choctaw	1023	Georgia Pacific	3221	Pulp and Paper Plant	32.2272	85.0255	7530 Hwy 114	Pennington	AL	19.1
821481	LADEQ08	6LA	East Baton Rouge	22033	Georgia-Pacific Consumer Operations LLC - Port Hudson Operations Graphic Packaging International Inc - West Monroe Mill #31	3221	Pulp and Paper Plant	30.65064	88.0249	4000 W Mount Pleasant Rd	Zachary	LA	19.1
573401	LADEQ08	6LA	Ouachita	22073	Georgia Gulf Chemicals & Vinyls LLC - Plaquemine Division	3221	Pulp and Paper Plant	32.4832	92.1522	1000 Jonesboro Rd	West Monroe	LA	13.1
722701	LADEQ08	6LA	Iberville	22047	Georgia Gulf Lake Charles LLC	3252	Plastic, Resin, or Rubber Products Plant	30.26543	91.1842	26100 Hwy 405 S	Plaquemine	LA	10.5
836111	LADEQ08	6LA	Calcasieu	22019	DOMTAR PAPER CO/JOHNSONBURG MILL	32511		30.25228	93.2862	4600 VCM Plant Rd	Westlake	LA	8.1
655961	LADEP	3PA	Elk	42047	MAC VALVES INC	3221	Pulp and Paper Plant	41.49085	78.6775	400 W CENTER ST	JOHNSONBURG	LA	8.1
665051	MIDEQ	5MI	Oakland	26125	Westlake Vinyls Inc	332911		42.519	83.518	30569 BECK ROAD	WIXOM	MI	7.1
592941	KYDAQ	4KY	Marshall	21157		325998		37.05111	88.3342	2468 Industrial Pkwy	Calvert City	KY	8.1

From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]

Sent: Wednesday, June 24, 2015 4:01 PM

To: Strum, Madeleine

Cc: Palma, Ted

Subject: RE: priority facility emissions question

They are permitted for 170 TPY, so I think it is valid. It is also consistent with that the new owner reported this year.

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]
Sent: Wednesday, June 24, 2015 2:47 PM
To: Kelly Petersen
Cc: Palma, Ted
Subject: priority facility emissions question

Kelly

Can you verify the emissions of chloroprene from the below facility?

Facility ID	FIPS Tribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million) (tpy)	Facility Name	County State	County Name	Comm
8026612	2095	Cancer risk	Chloroprene	16.0440.077	E I DuPont de Nemours & Co - Pontchartrain Site	LA	St. John the Baptist	

Thanks

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

To: Palma, Ted[Palma.Ted@epa.gov]; Rimer, Kelly[Rimer.Kelly@epa.gov]
From: Morris, Mark
Sent: Fri 10/16/2015 11:55:54 AM
Subject: Fw: Follow up on chloroprene modeling and additional questions

Ex. 5 - Deliberative

From: PATRICK.A.WALSH@dupont.com <PATRICK.A.WALSH@dupont.com>
Sent: Thursday, October 15, 2015 6:27 PM
To: Kelly.Petersen@LA.gov; Doris.B.Grego@dupont.com; James.B.Allen@dupont.com;
Carlos.F.Saldana@dupont.com; Palma, Ted; Morris, Mark; Casso, Ruben; Rimer, Kelly; Strum, Madeleine
Subject: RE: Follow up on chloroprene modeling and additional questions

All,

I have reviewed all the appropriate information and my position hasn't changed. I'm worried that EPA is going down the wrong path. Let me explain my thinking to you:

My problem is that the data as presented by EPA with regard to NATA are presented as "cancer risk":

Facility ID	FIPS	Tribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million)	Facility Emissions (tpy)	Facility Name	State	County Name	Comments
802661	22095		Cancer	Chloroprene	1.616041	130.0775	E I DuPont de Nemours & Co - Pontchartrain Site	LA	St. John the	

(Taken from email from Madeleine Strum to Kelly Petersen, 6/24/15)

That would read to most people that chloroprene is a known, proven human carcinogen. But it hasn't been proven, or even generally accepted, and EPA's own toxicology data states such.

The IRIS database for chloroprene reads similarly to the IARC monograph:

"Under the Guidelines for Carcinogen Risk Assessment (U.S. EPA, 2005), there is evidence that chloroprene is 'likely to be carcinogenic to humans'"

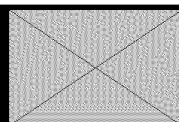
Even the IRIS group will not explicitly state that chloroprene is a KNOWN human carcinogen. The entire series of documents discusses chloroprene's carcinogenicity in mice and rats only. While they can be used as models for human physiology, mice and rats are NOT human, and there are numerous examples of materials that are spectacularly toxic to non-human animals but have little or no effect on humans (chocolate springs to mind). Therefore, it is, in my opinion, an irresponsibly large leap to present the chloroprene release data as definitely carcinogenic to humans by presenting it as "increased cancer risk".

In addition, the epidemiological data does not comport with the model at all. The following table describes actual cancer rates for St. John Parish for the most recent 4-year period for which data is available:

Rank	County	Annual Incidence Rate(†) over period cases per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval	Average Annual Count over period	Rate Period	Recent Trend	Recent 5- Year Trend (‡) in Incidence Rates	Lower 95% Confidence Interval	Upper 95% Confidence Interval
53	St. John the Baptist Parish(7,9)	460.8	432.3	490.7	209	2008-2012	stable	-2.2	-9.4	5.6

(Data from

<http://statecancerprofiles.cancer.gov/incidencerates/index.php?stateFIPS=22&cancer=001&race=00&sex=0&age=001&t>



[Read more...](#)

Given the following:

1. 50+ year history making chloroprene in St. John Parish
2. 20-30 year latency period for most cancers

According to the risk factors EPA attributes to our chloroprene emissions, St. John Parish should have the highest cancer rate in the state. This should be especially true given that our history of emitting chloroprene is much longer than the typical latency for cancer. But in actuality, St. John is in the lowest quartile of measured cancer rates in the state (#53 out of 66 parishes) and the rate of cancer is decreasing according to the 5-year trend. Thus, the model has a serious flaw as it doesn't come close to reflecting real, published cancer rate data.

The above, taken together, indicate that EPA is planning to publish misleading data in an inflammatory way. Therefore, it would be irresponsible to publish it. I strongly urge EPA to reconsider its present course.

Patrick A. Walsh, CIH
E.I. DuPont De Nemours and Company
Safety, Health, Environmental, and PSM Manager
DuPont Performance Polymers Pontchartrain Works
LaPlace, LA 70068

(985) 536-5731 Work

Ex. 6 - Personal Privacy
Patrick.A.Walsh@dupont.com

-----Original Appointment-----

From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]

Sent: Tuesday, October 06, 2015 10:09 AM

To: Kelly Petersen; GREGO, DORIS B; ALLEN, JAMES B; SALDANA, CARLOS F; Palma, Ted; Morris, Mark; Casso, Ruben; 'Rimer, Kelly'; Strum, Madeleine; WALSH, PATRICK A.

Subject: Follow up on chloroprene modeling and additional questions

When: Tuesday, October 06, 2015 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

Where: `DEQ/Room 919 - OMF Conference

Please join a conference call at 11am central time on Tuesday, October 6th. The call in information is below.

Meeting Number: **Ex. 6 - Personal Privacy**

To join the conference call:

Ex. 6 - Personal Privacy

(2) Enter the Meeting Number, then #

Thanks, Kelly Petersen

This communication is for use by the intended recipient and contains information that may be Privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

Francais Deutsch Italiano Espanol Portugues Japanese Chinese Korean

http://www.DuPont.com/corp/email_disclaimer.html

From: Kelly.Petersen@LA.gov
Importance: Normal
Subject: FW: Follow up on chloroprene modeling and additional questions
Start Date/Time: Tue 10/6/2015 4:00:00 PM
End Date/Time: Tue 10/6/2015 5:00:00 PM

-----Original Appointment-----

From: Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]
Sent: Monday, October 05, 2015 10:18 AM
To: Kelly Petersen; Doris.B.Grego@dupont.com; James.B.Allen@dupont.com; Carlos.F.Saldana@dupont.com; Palma, Ted; Morris, Mark; Casso, Ruben; Rimer, Kelly; Strum, Madeleine; PATRICK.A.WALSH@dupont.com
Subject: Follow up on chloroprene modeling and additional questions
When: Tuesday, October 06, 2015 11:00 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).
Where:

Please join a conference call at 11am central time on Tuesday, October 6th. The call information is below.

Ex. 6 - Personal Privacy

Thanks, Kelly Petersen

To: Pagan, Ines[Pagan.Ines@epa.gov]
From: Palma, Ted
Sent: Mon 12/14/2015 1:23:44 PM
Subject: RE: Draft of answers
Chloroprene QA tp.docx

you may want Darcie to review this when she gets in

Ted

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

palma.ted@epa.gov

From: Pagan, Ines
Sent: Sunday, December 13, 2015 9:05 PM
To: Rimer, Kelly <Rimer.Kelly@epa.gov>
Cc: Palma, Ted <Palma.Ted@epa.gov>
Subject: Draft of answers

Attached is a draft of answers, I need a little more context and I can edit the document first thing in the morning accordingly. There is a question on 2008 NATA better suited for Ted.

Ines Pagan

DVM, Ph.D.

Toxicologist

Air Toxics Assessments Group

Office of Air Quality Planning and Standards

Health and Environmental Impacts Division

Phone: (919) 541-5469

Fax: (919) 541-0840

109 TW Alexander Dr.

Mailcode C539-02

Durham, NC 27711

To: Smith, Darcie[Smith.Darcie@epa.gov]
From: Palma, Ted
Sent: Mon 10/19/2015 1:39:35 PM
Subject: RE: Background on NATA and chloroprene risk results

Ted Palma
USEPA
OAQPS/HEID/ATAG
MD C539-02
RTP, NC 27711

919-541-5470 (work)
palma.ted@epa.gov

-----Original Appointment-----

From: Pagan, Ines

Sent: Friday, October 16, 2015 9:15 AM

To: Pagan, Ines; Rimer, Kelly; Birchfield, Norman; Flowers, Lynn; Sams, Reeder; Davis, Allen; Woodall, George; RTP-OAQPS; Benner, Tim; Fegley, Robert

Ex. 6 - Personal Privacy

RTP-OAQPS-BLDG-C; Palma, Ted;

Subject: Background on NATA and chloroprene risk results

When: Wednesday, October 21, 2015 9:30 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).

Where: RTP-C500C-Max20/RTP-Bldg-C

The purpose of this meeting is to provide background information on NATA findings prior to roll out to the public.

To: Strum, Madeleine[Strum.Madeleine@epa.gov]
From: Palma, Ted
Sent: Fri 9/18/2015 5:58:49 PM
Subject: RE: one pager and RWC surrogate changes
Neoprene production RTR v3.docx

FYI here is the DuPont 1 pager, keep it to yourself for now please

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

palma.ted@epa.gov

From: Strum, Madeleine
Sent: Friday, September 18, 2015 1:21 PM
To: Palma, Ted; Morris, Mark
Subject: one pager and RWC surrogate changes

Ted

Here is v2 of one-pager with rwc and some spelling corrected.

I also put a place holder in for number of areas.

Mark – can you from this list of counties > 100 count the area.

Finally I've attached the meeting summary with the RWC wood changes to discuss with Ted before he sails off.

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

To: Smith, Darcie[Smith.Darcie@epa.gov]
From: Palma, Ted
Sent: Wed 8/26/2015 8:13:12 PM
Subject: Neoprene
Neoprene prodaction RTR.docx

First draft

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

palma.ted@epa.gov

To: Strum, Madeleine[Strum.Madeleine@epa.gov]
From: Palma, Ted
Sent: Thur 7/23/2015 11:18:11 AM
Subject: LA tracts
[NATA Brefing Jordan 7232015-v4.pptx](#)
[LA county cancer risks.xlsx](#)

Kelly wants us prepared to discuss what's going in in LA,

see the two additional slides I added to the end, I will just bring a few copies if you think I should. Also here is my spreadsheet (see plot tab)

Ex. 5 - Deliberative

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

palma.ted@epa.gov

To: Hirtz, James[Hirtz.James@epa.gov]
From: Palma, Ted
Sent: Wed 7/22/2015 11:37:26 AM
Subject: FW: priority facility emissions question

the facility of interest is : E I DuPont de Nemours & Co - Pontchartrain Site in LA

see some of the correspondence with the state below

Ted Palma

USEPA

OAQPS/HEID/ATAG

MD C539-02

RTP, NC 27711

919-541-5470 (work)

palma.ted@epa.gov

From: Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]
Sent: Thursday, June 25, 2015 11:15 AM
To: Strum, Madeleine

Cc: Palma, Ted; Morris, Mark
Subject: RE: priority facility emissions question

I have contacted my contact for this facility, but it seems she will be out of the country until next Tuesday. Will this be a problem?

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]
Sent: Thursday, June 25, 2015 8:37 AM
To: Kelly Petersen
Cc: Palma, Ted; Morris, Mark
Subject: RE: priority facility emissions question
Importance: High

Kelly,

I checked TRI and it is way lower. Also it is important that we use actual and not permitted emissions. Could you look more into this one?

They are under 2 different TRI ids (not sure why)

1. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70068DPNTD560HW

CHLOROPRENE (TRI Chemical ID: 000126998)	AIR FUG	Pounds	2011 5568
CHLOROPRENE (TRI Chemical ID: 000126998)	AIR STACK	Pounds	25470

2. http://oaspub.epa.gov/enviro/tris_control_v2.tris_print?tris_id=70069DPNTPHIGHW

They have no reported emissions for 2011

		2013	2012	2011
CHLOROPRENE	AIR FUG	Pounds 12000	21278	NR
(TRI Chemical ID: 000126998)				
CHLOROPRENE	AIR	Pounds 240000	228452	NR
(TRI Chemical ID: 000126998)	STACK			

In the 2011 NEI v2, this facility has the highest chloroprene and the facility total is higher by the 2nd highest facility by 2 orders of magnitude. The emissions really don't seem correct.

EIS Identif	Program System Code	Region	State	County	State and County FIPS	Site Name	NAICS Codes	Facility Type	Latitude	Longitude	Address	City	State	12695
802661	LADEQ08	6LA	St. John the Baptist	22095	E I DuPont de Nemours & Co - Pontchartrain Site	325212			30.05674		586 Hwy 44	Laplace	LA	2601
735471	LADEQ08	6LA	East Baton Rouge	22033	Formosa Plastics Corp Louisiana	325212	Plastic, Resin, or Rubber Products Plant		30.50172		N end of Gulf States Rd	Baton Rouge	LA	13
808471	NCDAQ	4NC	Granville	37077	Bridgestone-Bandag, LLC	326212			36.29622		505 West Industry Drive	Oxford	NC	338.2
625291	MSDEQ	4MS	Tishomingo	28141	International Converter	322220			34.8148		4309 Paul	luka	MS	317
758671	TXCEQ	6TX	Taylor	48441	ABILENE PLANT	326212	Plastic, Resin, or Rubber Products Plant		32.42878		99.650N FM 18 W OF ELMDALE RD	ABILENE	TX	2
106256	NCDAQ	4NC	Ashe	37009	The Gates Corporation	326212	Plastic, Resin, or Rubber Products Plant		36.4259		401 Gates Lane	Jefferson	NC	152
136106	LADEQ08	6LA	Iberville	22047	Shintech Louisiana LLC - Plaquemine PVC Plant	325212	Plastic, Resin, or Rubber Products Plant		30.2594		26270 Hwy 405	Plaquemine	LA	112.6
736921	MODNR	7MO	Greene	29077	TRANSMISSION PRODUCTS INC- SPRINGFIELD	326212	Automobile/Truck or Parts Plant		37.16399		2601 W	SPRINGFIELD	MO	41.
779031	NCFCED	4NC	Forsyth	37067	HIGHLANDS INDUSTRIES	3133	Textile, Yam, or Carpet Plant		36.12031		215 DRUMMOND ST.	KERNERSVILLE	NC	35.22
563341	TXCEQ	6TX	Calhoun	48057	FORMOSA POINT COMFORT PLANT	325212	Plastic, Resin, or Rubber Products Plant		28.6753		201 FORMOSA DR	POINT COMFORT	TX	27
100021	ADEM	4AL	Russell	1113	MeadWestvaco Mahrt Mill	322112	Pulp and Paper Plant		32.1774		4817 Hwy 165 S	Phenix City	AL	
744211	ADEM	4AL	Choctaw	1023	Georgia Pacific	322112	Pulp and Paper Plant		32.2272		7530 Hwy 114	Pennington	AL	
821481	LADEQ08	6LA	East Baton Rouge	22033	Georgia-Pacific Consumer Operations LLC - Port Hudson Operations	322112	Pulp and Paper Plant		30.65064		4000 W Mount Pleasant Rd	Zachary	LA	19.
573401	LADEQ08	6LA	Ouachita	22073	International Inc - West Monroe Mill #31	322112	Pulp and Paper Plant		32.4832		4000 Jonesboro Rd	West Monroe	LA	13.

7227011				Georgia Gulf Chemicals & Vinyls LLC - Plaquemine Division	3252	Plastic, Resin, or Rubber Products Plant	30.26543	26100 Hwy 405 S	Plaquemine LA	10.5
8361111	LADEQ08	6LA	Iberville	22047	32511		91.1842			
655961	LADEQ08	6LA	Calcasieu	22019	32511		30.25228	1600 VCM Plant Rd	Westlake LA	8.
655961	PADEP	3PA	Elk	42047	3221	Pulp and Paper Plant	41.49085	100 W CENTER	JOHNSONBURG	8
665051	MIDEQ	5MI	Oakland	26125	332911		78.6775	ST		
592941	KYDAQ	4KY	Marshall	21157	325998		42.519	30569 BECK	WIXOM MI	7.
				Westlake Vinyls Inc			83.5186	ROAD		
							37.05111	2468 Industrial	Calvert KY	
							88.3342	Pkwy	City	

From: Kelly Petersen [<mailto:Kelly.Petersen@LA.GOV>]
Sent: Wednesday, June 24, 2015 4:01 PM
To: Strum, Madeleine
Cc: Palma, Ted
Subject: RE: priority facility emissions question

They are permitted for 170 TPY, so I think it is valid. It is also consistent with that the new owner reported this year.

Kelly Petersen

Air Permits Division

Louisiana Department of Environmental Quality

Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

From: Strum, Madeleine [<mailto:Strum.Madeleine@epa.gov>]
Sent: Wednesday, June 24, 2015 2:47 PM
To: Kelly Petersen
Cc: Palma, Ted

Subject: priority facility emissions question

Kelly

Can you verify the emissions of chloroprene from the below facility?

Facility ID	FIPSTribal Code	Parameter	Pollutant	Risk Value (cancer risk reported in a million)	Facility Emissions (tpy)	Facility Name	State	County Name	Community
8026612	2095	Cancer risk	Chloroprene	6.044	30.0775	E I DuPont de Nemours & Co - Pontchartrain Site	LA	St. John the Baptist	

Thanks

Madeleine Strum
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards/Air Quality Assessment Division/EIAG
919 541 2383 (voice)
919 541 0684 (fax)

To: Rimer, Kelly[Rimer.Kelly@epa.gov]
From: Weatherhead, Darryl
Sent: Mon 11/16/2015 8:41:18 PM
Subject: Re: Facility research

I hope it's helpful. If not, let me know.

Sent from my iPhone

On Nov 16, 2015, at 3:23 PM, Rimer, Kelly <Rimer.Kelly@epa.gov> wrote:

Thanks!

Safe travels...

From: Weatherhead, Darryl
Sent: Monday, November 16, 2015 8:53 AM
To: Rimer, Kelly <Rimer.Kelly@epa.gov>
Subject: FW: Facility research

FYI

From: Walton, Tom
Sent: Friday, November 13, 2015 4:07 PM
Subject: Re: Facility research

Darcie,

The attached file along with the attachments Art sent help to begin to answer your questions. I looked at DuPont reports available on line and news releases. I highlighted portions to show my basis for the following tentative conclusions. DuPont doesn't give much disaggregated information

- The plant involved in the neoprene (chloroprene rubber) production had 235 employees in December 2014. All are supposed to be offered jobs with the new owner
- DuPont will continue to serve as landlord at the Pontchartrain Works site, which also houses production for DuPont Protection Technologies. That unit makes Kevlar, the protective synthetic fiber used in the bullet-resistant vests worn by police and military personnel. The segment has 150 employees, all of which will also remain in LaPlace, the company said.
- Neoprene sales comprised less than 5 percent of DuPont Performance Polymers' sales in 2013
- \$4.2 billion estimate DuPont Performance Polymers unit
- Neoprene sales in 2013 may be less than \$210 million
- Even though the initial announcement was for the sale to be in the first half of this year I suspect international regulatory approval has not yet finished. A number of overseas competition agencies are considering or have considered the acquisition. So far, the relevant agencies in the United States, Germany, Taiwan and Ukraine have cleared the transaction. The transaction is still being reviewed in a number of other jurisdictions from a March 2015 report.

Please let me know if you have any questions.

Tom

From: Smith, Darcie
Sent: Thursday, November 12, 2015 5:39 PM
To: Walton, Tom
Cc: Weatherhead, Darryl; Diem, Art
Subject: Facility research

Hi Tom –

Can you help us with some economic information about a facility? It is the DuPont Pontchartrain Works facility in LaPlace, LA. (Sometimes it is also called the DuPont Pontchartrain Site.) It has a variety of MACT source categories present (e.g., HON, MON, styrene butadiene rubber production), and the one we are most interested in is the Neoprene production category. We would like some basic (??) info – no. of employees, status of their sale to a Japanese company (we think it is complete), pct of worldwide production, pct neoprene is of facility production/sales, etc. We don't have specific questions that we're trying to answer, but as we've been talking to people they've asked all

kinds of questions along these lines. If you need more context, please give me a call and I can provide more details.

Thanks,

Darcie

Darcie Smith

U.S. EPA/OAQPS/HEID/ATAG

Mail Drop C539-02

109 TW Alexander Dr.

RTP, NC 27711

(919) 541-2076

**Kinetic Modeling of β -Chloroprene Metabolism: Probabilistic in vitro-
in vivo Extrapolation of Metabolism in the Lung, Liver and Kidneys of
Mice, Rats and Humans**

SUPPLEMENTAL DATA

Yuching Yang, Matthew W. Himmelstein, Harvey J Clewell

Supplemental data

A. Supplemental text

A1. Detailed Microsomal Sample Preparation

A2. Description of Computational process for Markov-Chain Monte Carlo (MCMC) simulation

B. Exemplar model code

B1. AcslX code to describe the CD oxidation in the in-vitro system (PK model)

B2. AcslX code define the setting used for probabilistic analysis of CD in-vitro dataset

B3. Script to perform MCMC analysis of microsomal data (Rat liver as example)

C. Supplemental table and figures

C1. Summary of ANOVA results

C2. Comparison of tissues and gender-specific clearance for mouse and rat

C3. Probability frequency of chloroprene oxidative metabolism parameters

--

Supplemental Data A: Supplemental text
--

A.1 Detailed Microsomal Preparation

Female mice were 12.7 weeks of age at the time the liver and lung microsomes were prepared. Female rats were 10.9 weeks when liver and lung microsomes were made. For kidney microsomes, the male and female mice and rats were 11.9 weeks of age when the microsomes were made. Lung and liver microsomes were prepared by differential centrifugation as described by Himmelstein et al. (2004). The microsomal preparations were analyzed for protein by the Bradford (1976) method (Bio-Rad Laboratories, Hercules, California, U.S.A.). The P450 content was measured by spectrophotometry using established methods (Omura and Sato, 1964; Guengerich, 1982). All fractions were stored at -70°C . Stock protein were measured and used.

Human kidney microsomes were purchased from Xenotech (H0610.R, Lot No. 0810236, Lenexa, Kansas, U.S.A.). The preparation was a mixed pool (10 mg protein/mL) from 8 individuals representing 4 subjects per sex, 7 of which were Caucasian and one African American, with ages ranging from 48 to 69 years. The vendor characterized activity for NADPH-cytochrome c reductase and lauric acid 12-hydroxylation were 34.5 ± 0.3 and 0.820 ± 0.146 nmol/mg protein/min, respectively.

Reference:

- Bradford, M. M. (1976). "A rapid and sensitive method for the quantitation of microgram quantities of protein utilizing the principle of protein-dye binding." *Anal Biochem* 72: 248-54.
- Guengerich, F.P. in: A. Wallace Hayes (Ed.), *Analysis and Characterization of Enzymes in Principles and Methods of Toxicology*, third ed., Raven Press, New York, 1994, pp. 1259–1313, Chapter 35.
- Himmelstein, M. W., S. C. Carpenter and P. M. Hinderliter (2004). "Kinetic modeling of beta-chloroprene metabolism: I. In vitro rates in liver and lung tissue fractions from mice, rats, hamsters, and humans." *Toxicol Sci* 79(1): 18-27.
- Omura, T. and R. Sato (1964). "The Carbon Monoxide-Binding Pigment of Liver Microsomes. II. Solubilization, Purification, and Properties." *J Biol Chem* 239: 2379-85.

A.2 Description of Computational process for Markov-Chain Monte Carlo (MCMC) simulation

The following steps, describing a generalized computational procedure during the MCMC iterations, are applicable to both hierarchical and population-only Bayesian analysis conducted in current study.

- | Step | Computation |
|------|---|
| A | Sample population parameter 'M' from the prior distribution |
| B | Sample gender-specific variability 'S' from the prior distribution |
| C | Sample gender-specific parameter 'm' from Norm (M, S) |
| D | Calculate metabolic parameter (Vmax, Km or Vmax/Km) as exp(m) |
| E | Compute the model predictions with the updated model parameters |
| F | Compute the posterior likelihood with each new updated parameter based on their prior distributions and the experimental data |
| G | Repeat steps D-F for each gender |
| H | Repeat steps A-G for each MCMC iteration until convergence of the posterior distributions of M and m is reached. |

--

Supplemental Data B: Exemplar model code

B1. AcsIX code to describe the CD oxidation in the in-vitro system (PK model)

Chloroprene PK model for microsomal data

!! : CSL file is the actual PK model file
program invitro.csl

VARIABLE TIME

INITIAL

```

CONSTANT VMAX1a=0.      !'MAX RATE OF MET. (uMOL/HR/mg protein)'
CONSTANT VMAX1b=0.      !'MAX RATE OF MET. (uMOL/HR/mg protein)'
CONSTANT KM1a=0.1       !'MICHAELIS CONSTANT (uMOL/L)'
CONSTANT KM1b=0.1       !'MICHAELIS CONSTANT (uMOL/L)'

CONSTANT VK=0.          !'REPRESENT THE V/K COEFFICIENT FOR RAT LUNG (1/hr)'
CONSTANT RLOSS=0.       !'REPRESENT THE background loss rate (1/hr)'
CONSTANT P1=0.69        !'MEDIA/AIR PARTITION for CD'

CONSTANT A10=0.         !'INITIAL AMOUNT IN VIAL (uMOL)'

CONSTANT VVIAL=0.01163  !'VOLUME OF VIAL (L); Vial volume= 11.65 ml'
CONSTANT VMED=0.001     !'VOLUME OF MEDIA (L); Liquid volume'
VAIR=VVIAL-VMED         !'HEADSPACE'
CONSTANT PROT = 1.0     !'AMOUNT OF PROTEIN (mg)'

CONSTANT TF=0.          !'TIME OF FIRST SAMPLE (hr); kept same'
CONSTANT TI=0.2         !'INTERVAL BETWEEN SAMPLES (hr)kept same'
CONSTANT VINJ=0.0002    !'INJECTION VOLUME (L); based on Matt email'

```

!Initial Conditions'

```

CA10=A10/(VAIR+P1*VMED)
CM10=CA10*P1           !'CONC in SOLUTION'
CA1=CA10
CM1=CM10
A1I=0.

```

!TIMING COMMANDS'

```

CONSTANT TSTOP=1.1      !'LENGTH OF EXPOSURE (HOURS)'
CONSTANT POINTS=100.    !'NO. OF POINTS IN PLOT'
INTERVAL CINT=0.01
TS=TF
SCHEDULE step .AT. TF

```

END !'END INITIAL'

DYNAMIC

ALGORITHM IALG=2

DERIVATIVE

TERMT(TIME.GE.TSTOP)

! 'CD KINETICS (umoles/hr)'

```

R1Ma=(VMAX1a*CM1)/(KM1a+CM1)*PROT
R1Mb=(VMAX1b*CM1)/(KM1b+CM1)*PROT
RRLUNGVK=VK*CM1
RRLOSS=RLOSS*CM1
A1Ma=INTEG(R1Ma,0.)
A1Mb=INTEG(R1Mb,0.)
ARLUNGVK=INTEG(RRLUNGVK,0.)

```

```
ARLOSS=INTEG(RRLOSS, 0.) !background loss rate
```

```
CA1=(A10-A1Ma-A1Mb-ARLUNGVK-A1I-ARLOSS)/(VAIR+VMED*P1)
```

```
CM1=CA1*P1
```

```
A1=CA1*VAIR+CM1*VMED
```

```
! 'MASS BALANCE'
```

```
CHECK1 = A10 - (A1+A1Ma+A1Mb+A1I+ ARLUNGVK+ARLOSS)
```

```
DISCRETE step
```

```
PROCEDURAL
```

```
!Routine for sample loss'
```

```
  A1I=A1I+CA1*VINJ
```

```
  SCHEDULE step .AT. TS+TI
```

```
  TS=TS+TI
```

```
END          !'END PROCEDURAL'
```

```
END          !'END DISCRETE'
```

```
END          !'END DERIVATIVE'
```

```
END          !'END DYNAMIC'
```

```
END          !'END PROGRAM'
```

B2. AcsIX code define the setting used for probabilistic analysis of CD in-vitro dataset

M-Script to perform MCMC analysis of microsomal data: MCMC setting and function

```

function tchains = runmcmc(pchains = [])
% Driver code for MCMC analysis
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
LI = zeros(1, 1);
sLV = zeros(1, 1);
sLK = zeros(1, 1);
Vmax = zeros(1, 1);
Km = zeros(1, 1);
sVmax = zeros(2, 1);
sKm = zeros(2, 1);

numParms = 9
numChains = 1
numIts = 2000000
funcNames = ["mcInnit", "mcEvalLikelihoods", "mcEvalPriors", "mcSamplePriors", "mcEvalProposal", "mcSampleProposal"]
updateMode = 4
chains = mcmc(numParms, numIts, numChains, updateMode, funcNames, pchains);
save @format=ascii @file=mcmc_results.dat chains
tchains = chains([1:50:2000000].:);
end

function mcInnit()
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
global OpMcmcPriorBounds
OpMcmcPriorBounds = [...
0.01, 10
0.01, 10
0.01, 10
-10, 5
-10, 5
-20, 10
-20, 10
-20, 10
-20, 10
-20, 10
];
global OpMcmcAdaptive
OpMcmcAdaptive = 1;
global OpMcmcDelayedRejection

```

```

OpMcmcDelayedRejection = 0;
global OpMcmcAdaptPeriod
OpMcmcAdaptPeriod = 30;
global OpMcmcAdaptCovarScale
OpMcmcAdaptCovarScale = 1;
global OpMcmcLoggingPeriod
OpMcmcLoggingPeriod = 50;
global OpMcmcAdaptLowerThresh
OpMcmcAdaptLowerThresh = 0.25;
global OpMcmcAdaptUpperThresh
OpMcmcAdaptUpperThresh = 0.45;
global OpMcmcAdaptLowerThreshDR
OpMcmcAdaptLowerThreshDR = 0.45;
global OpMcmcAdaptUpperThreshDR
OpMcmcAdaptUpperThreshDR = 0.65;
global OpMcmcSigmaDecreaseFact
OpMcmcSigmaDecreaseFact = 0.9;
global OpMcmcSigmaIncreaseFact
OpMcmcSigmaIncreaseFact = 1.1;
global OpMcmcDRSigmaReduceFact
OpMcmcDRSigmaReduceFact = 0.2;
global OpMcmcDRSigmaReduceFactAM
OpMcmcDRSigmaReduceFactAM = 0.1;
global OpMcmcAdaptLowerThreshAM
OpMcmcAdaptLowerThreshAM = 0.15;
global OpMcmcAdaptUpperThreshAM
OpMcmcAdaptUpperThreshAM = 0.3;
global OpMcmcCovarScaleDecreaseFact
OpMcmcCovarScaleDecreaseFact = 20;
global OpMcmcCovarScaleIncreaseFact
OpMcmcCovarScaleIncreaseFact = 20;
global OpDemcSnookerFraction
OpDemcSnookerFraction = 0.1;
global OpDemcThinningFactor
OpDemcThinningFactor = 10;
global OpDemcB
OpDemcB = 0.0001;
end

function samp = mcSampleProposal(prevsamp)
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
samp = [];
% This function is a stub...
% Code for a user-defined proposal function can be inserted here.
end

function val = mcEvalProposal(samp, prevsamp)
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax

```

```
global Km
global sVmax
global sKm
global sVK
global preds
val = 0;
% This function is a stub...
% Code for a user-defined proposal function can be inserted here.
end
```

```
function mcDumpSamples()
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
LI
sLV
sLK
Vmax
Km
sVmax
sKm
end
```

```
function names = mcSampNames()
names = "LI";
names = [names, "sLV"];
names = [names, "sLK"];
names = [names, "Vmax"];
names = [names, "Km"];
names = [names, "sVmax(1)"];
names = [names, "sVmax(2)"];
names = [names, "sKm(1)"];
names = [names, "sKm(2)"];
names
end
```

```
function parms = mcPackSamples()
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
parms = [];
parms = [parms LI];
parms = [parms sLV];
parms = [parms sLK];
parms = [parms Vmax];
parms = [parms Km];
parms = [parms reshape(sVmax, 1, 2)];
```

```
    parms = [parms reshape(sKm, 1, 2)];
end

function mcUnpackSamples(parms)
    global zdata
    global firstT
    global lastT
    global firstD
    global lastD
    global CCC
    global LI
    global sLV
    global sLK
    global Vmax
    global Km
    global sVmax
    global sKm
    global sVK
    global preds
    idx = 1;
    LI = parms(idx); idx = idx + 1;
    sLV = parms(idx); idx = idx + 1;
    sLK = parms(idx); idx = idx + 1;
    Vmax = parms(idx); idx = idx + 1;
    Km = parms(idx); idx = idx + 1;
    sVmax = reshape(parms(idx:idx+1), 2, 1); idx = idx + 2;
    sKm = reshape(parms(idx:idx+1), 2, 1); idx = idx + 2;
end

function parms = mcSamplePriors()
    global zdata
    global firstT
    global lastT
    global firstD
    global lastD
    global CCC
    global LI
    global sLV
    global sLK
    global Vmax
    global Km
    global sVmax
    global sKm
    global sVK
    global preds
    LI = normrnd(1, 1);
    Vmax = unifrnd(-10, 5);
    Km = unifrnd(-10, 5);
    sLV = lognrnd(-1.2, 1.6);
    sLK = lognrnd(-1.2, 1.6);
    for gg = 1 : 2
        sVmax(gg) = normrnd(Vmax, sLV);
        sKm(gg) = normrnd(Km, sLK);
    end
    parms = mcPackSamples();
end

function val = mcEvalPriors(parms)
    global zdata
    global firstT
    global lastT
    global firstD
    global lastD
    global CCC
    global LI
    global sLV
    global sLK
    global Vmax
    global Km
    global sVmax
    global sKm
```

```

global sVK
global preds
mcUnpackSamples(parms);
val = 0.0;
val = val + normlpdf(LI, 1, 1);
val = val + uniflpdf(Vmax, -10, 5);
val = val + uniflpdf(Km, -10, 5);
val = val + lognlpdf(sLV, -1.2, 1.6);
val = val + lognlpdf(sLK, -1.2, 1.6);
for gg = 1 : 2
    val = val + normlpdf(sVmax(gg), Vmax, sLV);
    val = val + normlpdf(sKm(gg), Km, sLK);
end
end

function val = mcEvalLikelihoods(parms)
global zdata
global firstT
global lastT
global firstD
global lastD
global CCC
global LI
global sLV
global sLK
global Vmax
global Km
global sVmax
global sKm
global sVK
global preds
mcUnpackSamples(parms);
val = 0.0;
sVK = 0;
for gg = 1 : 2
    for i = firstD(gg) : lastD(gg)
        preds = getpreds(sVmax(gg), sKm(gg), sVK, CCC(i), gg);
        for j = firstT(gg) : lastT(gg)
            if(~isnan(zdata(j, i)))
                val = val + normlpdf(zdata(j, i), preds(j), LI);
            end
        end
    end
end
end
end
end

```

B3. Script to perform MCMC analysis of microsomal data (Rat liver as example)

```
load @format = model @file = /home/yyang/work/Chloroprene/ACSL/MCMC/RatBothLiver/chain1/invitro.so
```

```
prepare @clear
prepare @all
```

```
disp('Both Fisher Rat, Liver Case')
seedrnd(4556)
```

```
VVIALF=0.01165; %% Male ==VVIAL=.0119573;
VVIALM=0.0119573;
VMED=.001;
VINJF=0.0002; %% Male ==VIN=0.0003858 !important
VINM=0.0003858;
VAIRF=VVIALF-VMED;
VAIRM=VVIALM-VMED;
TSTOP=1.2;
TF=0.;
Ti=0.2;
PROT = 1.0;
P1 = 0.69;
WESITG=0;
WEDITG =0;
```

```
start @nocallback
```

```
global _ca1
global _time
global zdata
global tFindex
global tMindex
```

```
global firstT
global lastT
global firstD
global lastD
global CCC
global ControlData
```

```
use ('/home/yyang/work/Chloroprene/ACSL/MCMC/Control/ControlData.m')
```

```
%CDF Liver Summary
```

%Time	1 ppm	10 ppm	50 ppm	150 ppm	270 ppm
0.	0.052	0.465	1.935	6.243	11.007
0.2	0.015	0.141	0.844	4.460	9.091
0.4	0.006	0.048	0.360	3.274	7.661
0.6	0.003	0.022	0.188	2.479	6.621
0.8	0.002	0.011	0.103	1.958	5.831
1.	NaN	0.007	0.066	1.607	5.202

```
%[Time 264 ppm 132 ppm 50 ppm
```

%[Time	264 ppm	132 ppm	50 ppm
0	2.0125	4.6755	9.824;
0.025	2.18	4.503	9.454;
0.05	1.634	4.318	8.939;
0.1	1.354	3.918	9.767;
0.15	1.113	3.708	9.603;
0.2	0.893	3.217	7.856;
0.225	0.931	3.007	7.581;
0.25	0.706	2.885	7.02;
0.3	0.545	2.559	7.925;
0.35	0.419	2.478	7.679;
0.4	0.291	2.0245	6.097;
0.425	0.308	1.841	5.974;
0.45	0.237	1.786	5.568;
0.5	0.175	1.547	6.201;

0.55	0.125	1.558	NaN;
0.6	0.077	1.1375	4.637;
0.625	0.082	1.01	4.584;
0.65	0.067	0.995	4.231;
0.7	0.048	0.837	NaN;
0.75	0.034	0.708	NaN;
0.8	0.0195	0.5715	3.482;
0.825	0.02	0.483	3.428;
0.85	0.018	0.489	3.18;
0.9	NaN	0.397	NaN;
0.95	0.009	NaN	NaN;

```
tempF= size(FratFLiver);
tempM= size(FratMLiver);
```

```
ID_Time = 1;
ID_DoseF = [(ID_Time+1):1:tempF(2)];
ID_DoseM = [(ID_Time+1):1:tempM(2)];
```

```
dataF = FratFLiver(:, ID_DoseF);
dataM = FratMLiver(:, ID_DoseM);
```

```
tempF= size(dataF);
tempM= size(dataM);
```

```
tFindex = FratFLiver(:, ID_Time);
tMindex = FratMLiver(:, ID_Time);
```

```
% number of time points :max(tempM(1), tempF(1))
% number of dose : (tempM(2)+tempF(2))
```

```
zdata = NaN* ones([max(tempM(1), tempF(1)), (tempM(2)+tempF(2))]); % corresponde to max 25 timepoints and 5 dose each
gender
zdata(1:tempF(1), 1:tempF(2)) = dataF ;% first Female, then Male
zdata(1:tempM(1), tempF(2)+1:tempF(2)+tempM(2)) = dataM;
```

```
firstT = [1, 1];% time point;% first Female, then Male
lastT = [tempF(1), tempM(1)];
firstD = [1, tempF(2)+1];% dose groups% first Female, then Male
lastD = [tempF(2), tempF(2)+tempM(2)];
```

```
AAF=dataF(1,:)*(VAIRF+P1*VMED);
AAB=dataM(1,:)*(VAIRM+P1*VMED);
```

```
CCC = [AAF, AAB];
zdata=log(zdata);
```

```
function preds = getpreds(Vmax, Km,VK, A10, Gender)
    global _ca1
    global _time
    global tFindex
    global tMindex
    global ControlData
```

```
% draw back ground loss rate
tmp = ceil(rand*500);
lossR = ControlData(tmp);
setmdl("RLOSS", exp(lossR));
```

```
setmdl("VMAX1A", exp(Vmax)); % reset model parameter as global variables
setmdl("KM1A", exp(Km));
setmdl("VK", VK);
setmdl("A10", A10);
```

```
if Gender==1
    tindex = tFindex;
    setmdl("VVIAL", 0.01165);
    setmdl("VINJ", 0.0002);
```

```
else
    tindex = tMindex;
    setmdl("VVIAL", .0119573);
    setmdl("VINJ", 0.0003858);
end

data @clear
data("SAMPTIMES", ["T"], tindex);

start @nocallback

preds = NaN*ones(length(tindex), 1);

for i = 1:length(tindex)
    idx = find(_time == tindex(i));
    if(idx ~= [])
        preds(i) = max(0.0, _ca1(idx));
    end
end

preds = log(preds);

end

use invitromc11.m
chains = runmcmc();
```

--

Supplemental Data C: Tables and Figures

C1: Summary of ANOVA results

Table S1 presents the summary results of the Kruskal–Wallis one-way analysis of variance (ANOVA). Kruskal–Wallis ANOVA is a non-parametric method for testing whether samples originate from the same distribution. In this analysis, the null hypothesis is whether the posterior distributions of tissue-specific intrinsic clearance for male and female are the same for mice and rat. Table S2 is an example ANOVA outputs generated in Matlab.

Table S1: Summary of Kruskal–Wallis ANOVA results

	Rat Prob>Chi-Sq	Mice Prob>Chi-Sq
intrinsic clearance		
Liver	0	0
Lung	<0.0001	0
Kidney	0	0

Table S2: Kruskal-Wallis ANOVA TABLE of Intrinsic Clearance of Lung in Rat

Source	SS	dF	MS	Chi-sq	Prob>Chi-sq
Column	5.44E+09	1	5.43E+09	652.68	5.83E-144
Error	7.79E+10	9998	7.79E+06		
Total	8.33E+10	9999			

C2: Comparison of tissues and gender-specific clearance for mouse and rat

Figure S1. Comparison of Distributions of Gender-specific Intrinsic Clearance in Liver, Lung, Kidney for Mice

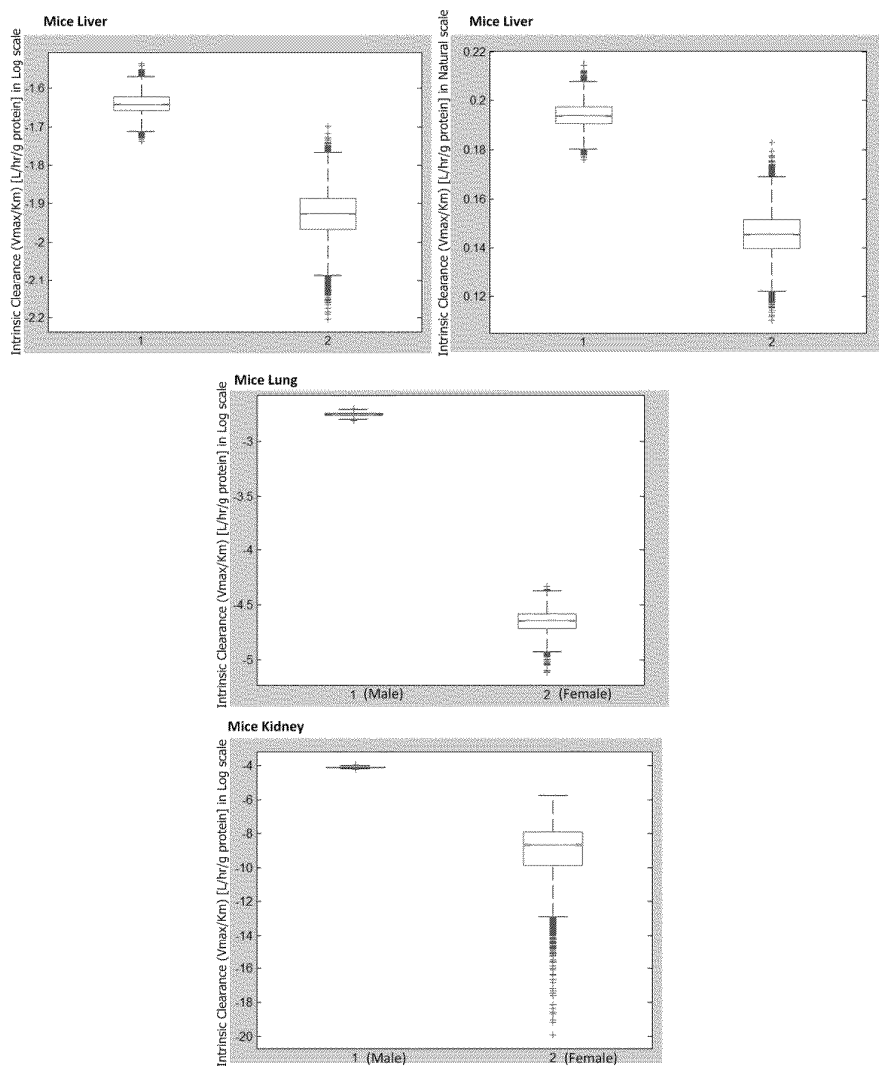
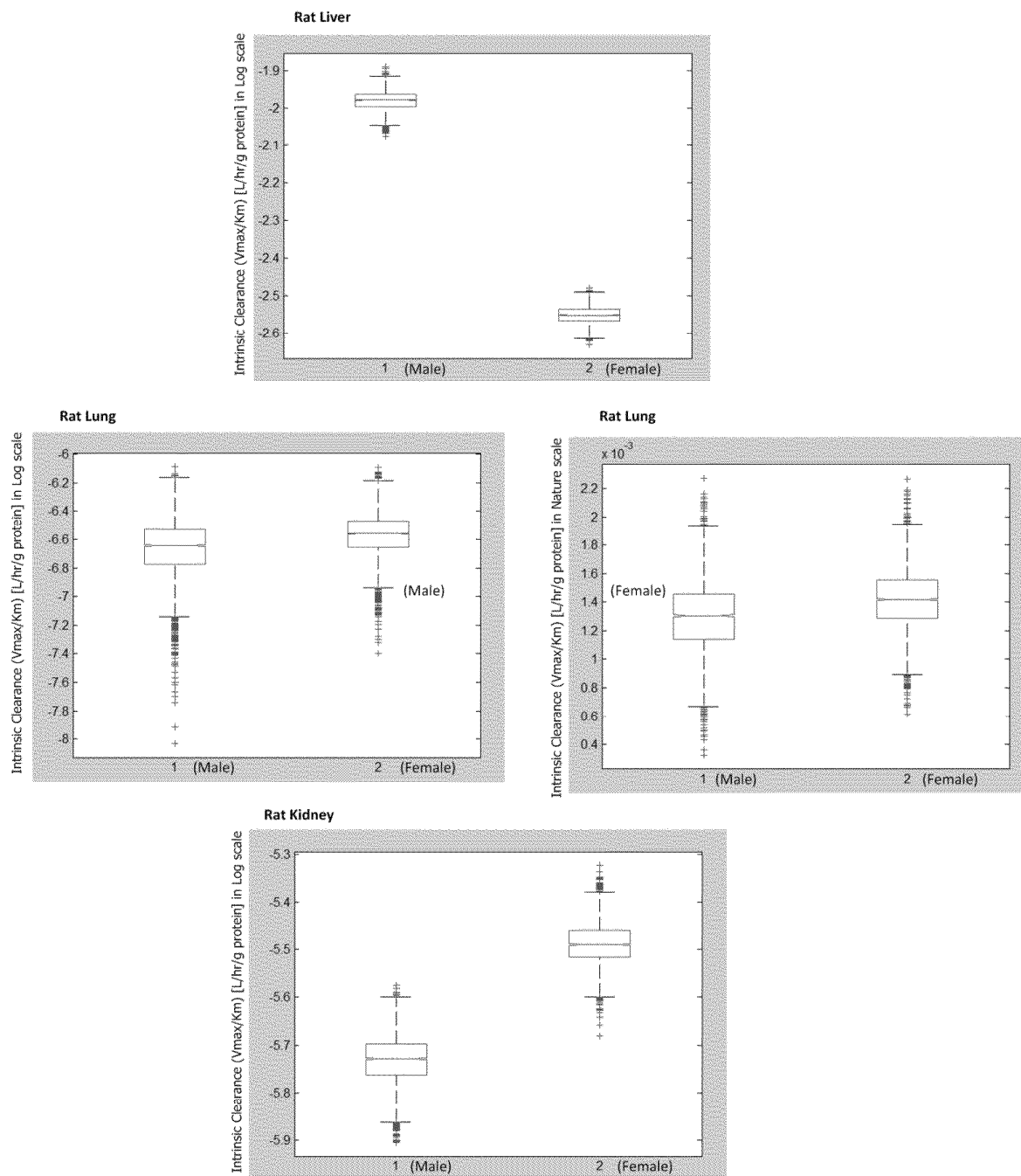
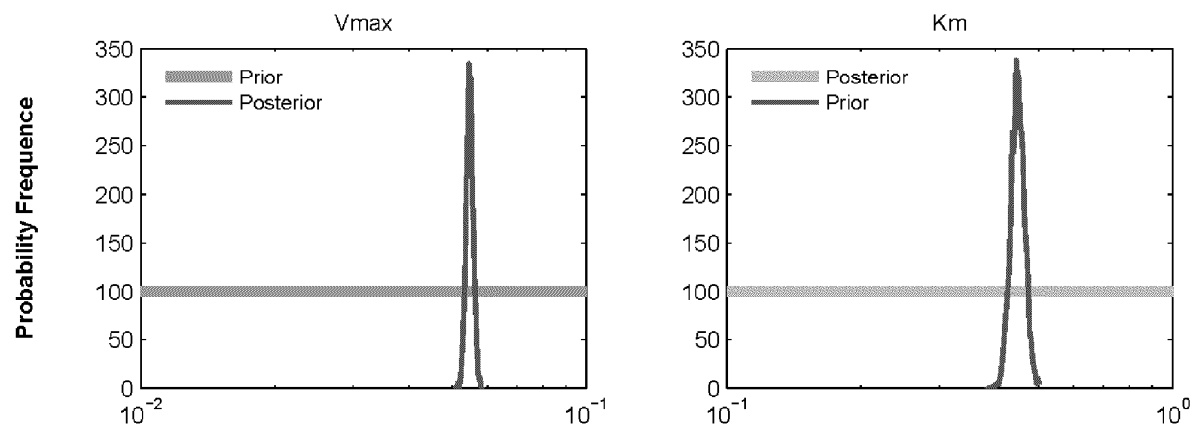


Figure S2. Comparison of Distributions of Gender-specific Intrinsic Clearance in Liver, Lung, Kidney for Rat



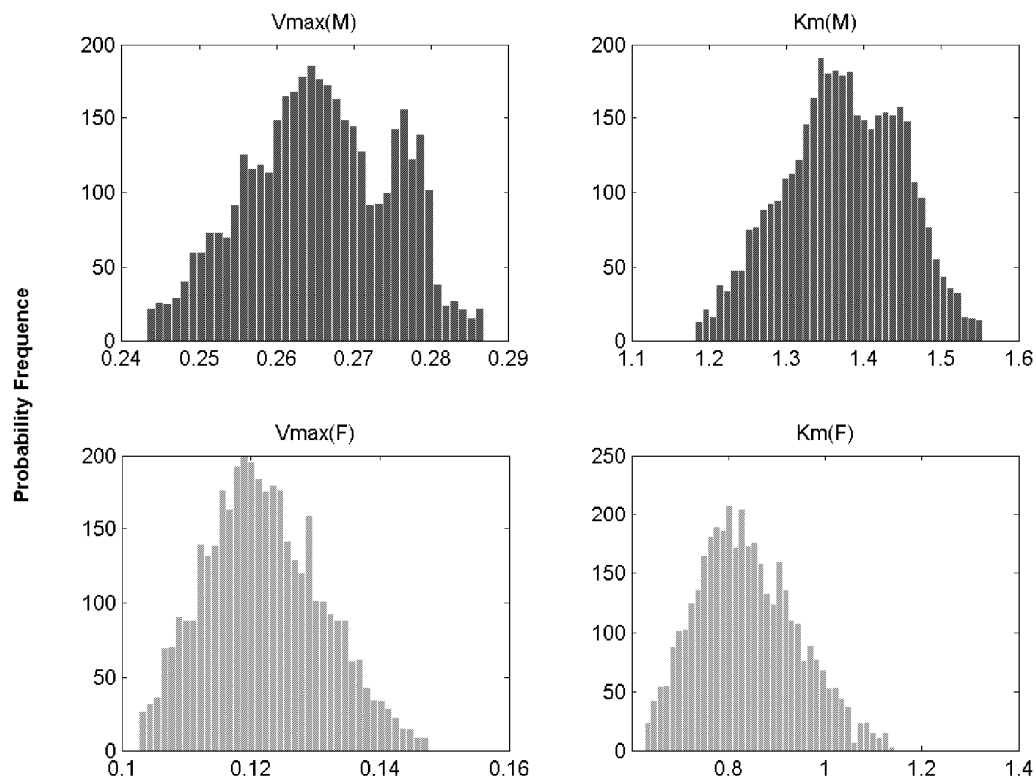
C3: Probability frequency of chloroprene oxidative metabolism parameters

Figure S3. Representative comparison of uniform prior and posterior distributions for human (pooled mixed gender) liver microsomal metabolism parameters



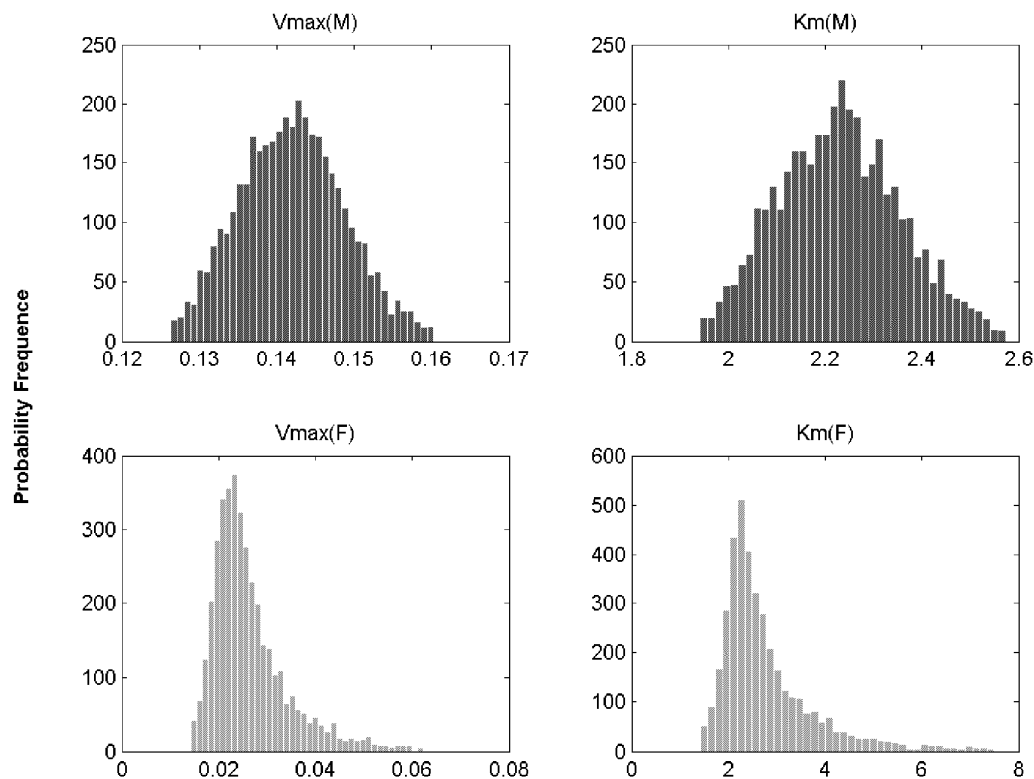
Note: Vmax ($\mu\text{mol/hr/mg}$ microsomal protein) or Km ($\mu\text{mol/L}$) posterior frequency counts (per 4000 simulations).

Figure S4. Probability frequency of chloroprene oxidative metabolism parameters in male (M) and female (F) B6C3F1 mouse liver microsomes



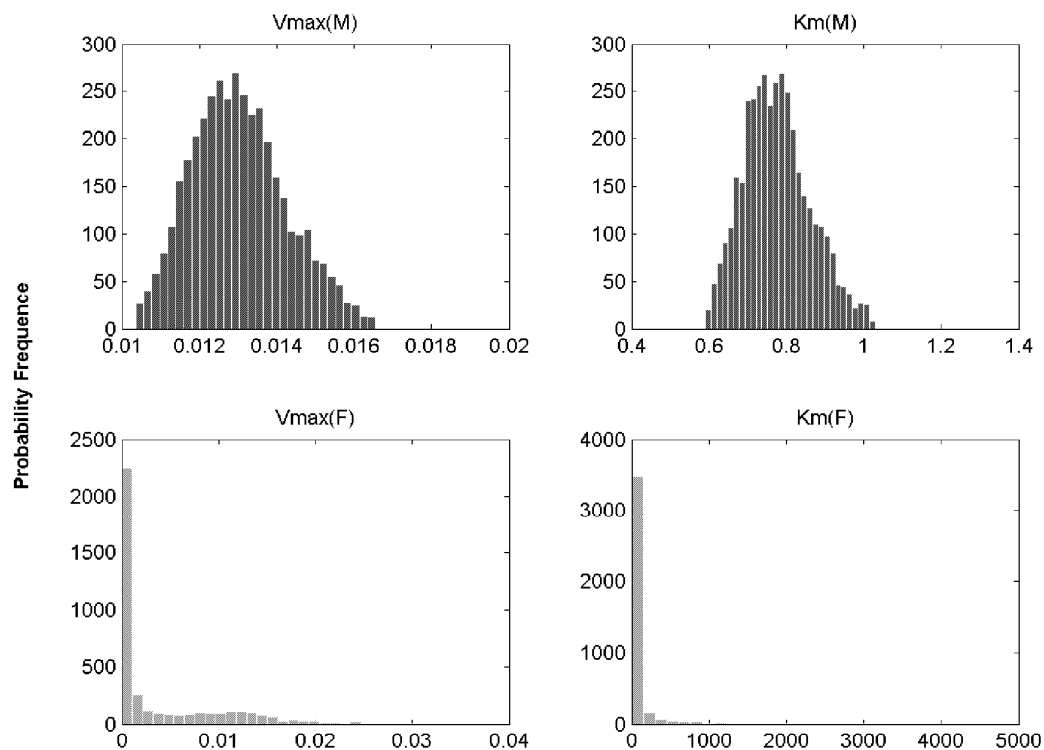
Note: Vmax ($\mu\text{mol/hr/mg}$ microsomal protein) or Km ($\mu\text{mol/L}$) posterior frequency counts (per 4000 simulations).

Figure S5. Probability frequency of chloroprene oxidative metabolism parameters in male (M) and female (F) B6C3F1 mouse lung microsomes



Note: Vmax ($\mu\text{mol/hr/mg}$ microsomal protein) or Km ($\mu\text{mol/L}$) posterior frequency counts (per 4000 simulations).

Figure S6. Probability frequency of chloroprene oxidative metabolism parameters in male (M) and female (F) B6C3F1 mouse kidney microsomes



Note: Vmax ($\mu\text{mol/hr/mg}$ microsomal protein) or Km ($\mu\text{mol/L}$) posterior frequency counts (per 4000 simulations).